

The Local Plan 2045 will be used to ensure
Oxford is a fairer, greener and healthier city

Oxford City Council Response to Inspectors' Matters, Issues, and Questions

Matter 2: Housing and Employment Need

Issue 1 – Local Housing Need

Q1 Using the standard method, what is the minimum number of new homes needed over the plan period? Is this adequately set out in the Plan?

The minimum number of new homes needed over the plan period using the Government standard method is 1,078 dwellings per annum (dpa) or 21,560 for the plan period 2025-2045.

This is the updated figure set out in the Updated Housing Capacity H1 ([CSD.009](#)) which applies the 2026 Government data published after publication of the Regulation 19 Plan. In the Oxford Local Plan 2045 Proposed Submission Draft ([CSD.001](#)) the figures were based on 2025 Government data, and the Standard Method calculation was 1,087 dpa.

However, as set out in the supporting text to Policy H1 Housing Requirement, this need is greater than the capacity of the city to deliver it. This is also explained further in Background Paper 001: Housing Need, Requirement and Mix ([BGP.001a](#)). The June 2026 assessment of capacity is 9,041 homes over the plan period, or 452 dwellings per annum ([CSD.009](#)) leaving an unmet housing need of 12,519 homes for 2025-2045. The evidence of how the capacity was calculated is set out in the Strategic Housing Land Availability Assessment (SHLAA), June 2026, ([HEA.004a](#)). Agreement has been reached with neighbouring authorities about the distribution amongst them of Oxford's unmet need arising from the Oxford Local Plan 2045.

The modification proposed in [CSD.009](#) is therefore considered to be required to ensure that the housing need (and also the distribution of unmet need) is correctly and clearly shown in the Plan.

Issue 2 – the Housing Requirement

Q1 How did the Council identify sites to assess in the SHLAA? Has a sufficient range of sites been considered for housing?

The Council took a positive and proactive approach to identifying sites for assessment in the Strategic Housing Land Availability Assessment (SHLAA).

Sites assessed in the SHLAA originate from a range of sources to meet the requirements of the SHLAA guidance, as explained in paragraph 2.14 of the SHLAA ([HEA.004a](#)), which includes sites already on or that had been in the planning system, and a desk-based mapping exercise. Sites assessed were rolled forward from the previous SHLAA ([HEA.003a](#)) and were re-assessed and updated. Sites were also identified for assessment via two Call for Sites exercises undertaken during the plan preparation and by proactively engaging with landowners of potentially suitable sites. This engagement is summarised in paragraphs 2.4 and 2.14 of the SHLAA ([HEA.004a](#)).

Very few types of land uses are excluded from the assessment, only designations where the constraint on development would be considered insurmountable. Therefore, excluded from the assessment are areas entirely or nearly all in undeveloped Flood Zone 3b, the SAC, SSSIs and Town Greens. However, if individual sites were identified through being an existing site allocation or were suggested by consultees or a Call for Sites, then the site was included, even if it was in an excluded designation (SHLAA paragraph 2.18 and Table 1 of [HEA.004a](#)).

The methodology used in the SHLAA followed guidance set out in the NPPF (February 2019) and relevant PPG (e.g. Green Belt) and was discussed and agreed with the other Oxfordshire districts (see Appendix 1 of the Cooperation Statement [COM.001](#)). Information on the methodology can be found in paragraphs 2.5 to 2.47 (pages 8-21) of the SHLAA Report June 2026 ([HEA.004a](#)). This covers the following: identifying sites to be assessed, site size threshold, sources of sites, land uses included or excluded, flood zones, nature conservation designations, Green Belt, public open space and open-air sports facilities, public and private open space, outdoor sports, allotments and Town Greens.

Q2 What is the minimum site size and/or threshold that the Council used? Is there potential for additional housing to come forward on smaller sites?

The minimum site size and threshold applied in the Strategic Housing Land Availability Assessment (SHLAA) assessment is set out in paragraphs 2.6-2.13 (pages 8-10) ([HEA.004a](#)). In summary, the minimum site size threshold for residential sites is those with capacity to deliver 10+ net gain dwellings (or approximately 0.25ha) and for economic uses, sites of 0.25ha or capacity for 500 m² of floorspace.

An exercise was undertaken to understand the impacts of potentially reducing the threshold to 5 dwellings. As set out in paragraphs 2.10 and 2.11 (pages 8-9) of the report ([HEA.004a](#)), the conclusion of this exercise was that sites with capacity to deliver 10+ net gain dwellings remains the most appropriate threshold in the circumstances of the typical types of sites in

Oxford. The reason for this conclusion is that if the site size threshold were reduced to include sites of 5+ dwellings in the SHLAA then the windfall assumption would correspondingly need to be reduced to avoid double counting. In the capacity calculations, this adjustment resulted in an overall decrease in capacity over the plan period. This is because these small sites tend to make up a large proportion of Oxford's supply in comparison to most places, but these types of sites frequently come forward spontaneously and can't be identified far in advance. This would be of less relevance where they only ever make up a small part of the supply, but in Oxford, to attempt to identify these sites over the 20-year period and then not to include them in the windfall calculation would skew the capacity calculation unnecessarily. This exercise and indicative findings were also discussed with the district councils at the SHLAA workshops, where it was agreed that the site size threshold was appropriate for the context Oxford.

This threshold does not in any way prevent additional housing coming forward on smaller sites. Any smaller sites that were to come forward would be counted as windfall instead of being included in the identified supply in Table B - Sites with development potential ([HEA.004b](#)) (pages 140-144). The calculation of overall capacity in Table 7 (page 36) of the SHLAA ([HEA.004a](#)) includes a contribution from windfalls.

There are several sites included in Table A – All Sites Assessed ([HEA.004b](#)) (pages 49-139), that are judged as unlikely to have capacity for 10+ dwellings and/or fall below the site size threshold. These are then listed in Table C – Sites with development potential but capacity less than 10, also in the examination library as [HEA.004b](#) (pages 145-151), because they are counted through small-site commitments or the windfall allowance rather than as additional identified capacity. The approach therefore avoids double counting: a site is moved to Table B only if it is later demonstrated, for example through a planning permission, to deliver 10+ net dwellings.

Q3 In determining capacity, how did the Council take into account other land use designations and planning policies, including the Green Belt, green infrastructure and land designated for employment purposes?

The overall capacity calculation for the plan period, is set out in the Strategic Housing Land Availability Assessment (SHLAA, [HEA.004a](#)) and the SHLAA which is a key part of the evidence base on capacity. There has also been a wider iterative process between the SHLAA and the Plan spatial strategy and policies, and with the Sustainability Appraisal ([CSD.004a](#) & [CSD.004b](#)) which collectively influence the capacity as the plan evolves.

The SHLAA is the starting point for identifying sites with development potential. It includes consideration of land use designations and planning policies in Table A - All Sites Assessed (Suitability and Constraints columns) ([HEA.004b](#)) (pages 49-139), but it does not exclude sites on the basis of restrictive planning policies such as Green Belt or employment designations. Reflecting the significant need for housing in Oxford, the general approach in the SHLAA search for sites is to cast the net as widely as possible and explore all reasonable opportunities to identify capacity for housing in Oxford. Sites with the following types of constraints are all still included in the assessment: greenfield sites, Green Belt/grey belt, open air sports facilities,

green infrastructure corridors, locally designated wildlife sites (Local Wildlife Sites and Oxford City Wildlife Sites). For such sites, the constraints are identified (see Table A, Policy considerations and Physical/Environmental considerations columns), including where they would restrict development, but they are not ruled out outright but are still assessed to weigh up the balance ([HEA.004a](#) paragraph 2.17).

Within the Oxford City boundary there are, however, some clear intrinsic designations that represent insurmountable constraints to development (housing or employment). Therefore, excluded from the assessment are areas entirely or nearly all in undeveloped Flood Zone 3b, the SAC, SSSIs and Town Greens. The exception to this is if individual sites are identified through being an existing site allocation or suggested by consultees or through the Call for Sites. These sites are included even if they are in an excluded designation so as to ensure transparency of process and comprehensiveness.

Early drafts of SHLAA Table B ([HEA.004b](#)) provided the first stage of filtering of sites, to give a broad idea of the potential capacity that could be identified for the plan period, and informed which sites were to be taken forward for assessment in greater detail as potential site allocations. Sites that did not have insurmountable barriers to delivery were taken forward. That filtering process is explained further in Background Paper Developing Site Allocations ([BGP.002](#)) and is summarised in paragraph 2.7 of the paper. At that stage, the full evidence base for the plan was not available, such as an updated Green Infrastructure assessment, Green Belt Assessment and Employment Land Needs Assessment to help inform the Plan's spatial strategy and draft policies. Early iterations of the Sustainability Appraisal of sites and Site Capacity Assessments ([CAP.001 to CAP.053](#)), helped to identify potential sustainability impacts, likely mitigation measures needed (such as buffers along watercourses), and other factors that might impact on capacity such as contamination and proximate heritage assets.

In parallel to this, as the evidence base for the plan evolved (including engagement with stakeholders, landowners, and public consultation), so the strategy and policies of the plan continued to evolve, and this was reflected in iterations of the capacity assessment. For example: having a clearer idea as to how many green spaces were assessed as "Core" Green Infrastructure (the category needing the highest level of protection) (Green Infrastructure Study [GRE.001](#)); how much of the city would be classified as Flood Zone 3b with the latest forecasts (Strategic Flood Risk Assessment [GRE.015](#)); and how existing employment sites were functioning against identified needs in the assessment of employment land supply (Employment Land Needs Assessment [ECON.001](#)). The capacity assessment was also updated to reflect the latest finding of the Green Belt Assessment of Additional sites ([GRE.013a](#) and [b](#)), although sites were not excluded from further assessment on the basis of the outcomes of the Green Belt assessment (see response to Q3, Issue 3, Matter 3 for a fuller explanation of how Green Belt was considered).

The work was often iterative and sometimes resulted in adjustments to the site allocations when compared with what was listed and mapped at Regulation 18 ([CSD.003 Appendix 5](#) & the individual assessments within [PCD.001e](#)), for example red lines being adjusted, sites being combined, new sites added and some sites discounted as explained further in [BGP.002](#). The work also helped to inform key principles for the site allocation policies and identification of

potential mitigation requirements. It also assisted with the shaping of the policy approach to matters such as protection of employment sites, density/making efficient use of land, and protection of green spaces, which in turn helped to refine the individual site capacity assessments for the site allocation policies (and which also fed back into the capacity assumptions in Table B Sites with development potential ([HEA.004b](#)) (pages 140-144) so that the SHLAA used a bespoke site-specific residential capacity expected from the site rather than using a general density multiplier which had been used at earlier stages for those sites which did not have a planning permission.

Q4 How has the Council sought to maximise densities and prioritise the efficient use of land?

Oxford is a compact city, with competing needs and demand for land, so it is essential that land which comes forward for development is used efficiently, in order to meet as much of the City's needs for homes, whilst also balancing other plan objectives such as protecting biodiversity and not constraining economic growth.

Making efficient use of land is a key principle of the plan, as explained in Policy HD2 Making Efficient Use of Land ([CSD.001](#)). Policy HD2 sets out some key principles to ensure that sites make efficient use of land and maximise capacity, including setting minimum densities and identifying areas where there would be a reasonable expectation for higher density. This is also explained further in the Efficient Use of Land Background Paper ([BGP.003](#)).

The Council has also taken a positive and proactive approach to maximising densities and prioritising the efficient use of land in its estimate of capacity for the plan, and in setting requirements for the minimum amount of housing that is expected to be delivered on each site allocation.

The Strategic Housing Land Availability Assessment (SHLAA) ([HEA.004a](#)) explains the approach to density assumptions in paragraphs 2.63 to 2.66, including setting out indicative density assumptions for different site typologies (Table 3). It should be noted that those typologies are only applied to estimate capacities of a site in the Table B Assessment of sites with development potential ([HEA.004b](#)) in instances where there is not a bespoke site-specific density calculation available for a site. For sites with an extant planning permission, which has been tested in detail through the development management process, then that capacity is applied. For all of the sites with site allocations in LP2045 a site-specific capacity assessment is used to determine the capacity and the housing requirement figure for the site allocation policy. This has enabled an assessment in greater detail with the specific circumstances of the site, rather than applying a typology approach. This approach, using site-specific calculations of capacity where available, helps to ensure efficient use of sites and maximum densities.

Further information on the assumptions underlying the SHLAA and the minimum housing number requirements in both the site allocation policies and the SHLAA Table B capacity assessment can be found in the Developing Site Allocations Background Paper ([BGP.002](#)), the

SHLAA ([HEA.004a](#)), and the individual site capacity assessments ([CAP.016](#)). Maximising density and efficient use of land is also a theme through other policies in the plan, for example Policy E1 Employment Strategy highlights the need to make efficient use of land, and supports intensification and modernisation, as does Policy S2 High Quality Design, and Policy H1 Housing Requirement (all in [CSD.001](#)).

Q5 Are there any suitable, available and developable sites which the Council has not considered as part of the plan-making process? Could other sites (notably existing employment sites) be reused for housing?

The Strategic Housing Land Availability Assessment (SHLAA) ([HEA.004a](#)) assesses over 500 sites and has involved extensive engagement with landowners and other stakeholders to ensure that all reasonable options are included in the assessment to be considered as part of the plan-making process. Every effort has been made to identify capacity for housing. The SHLAA methodology explains the processes followed to identify sites to be assessed, and also the justification for any land uses that were excluded from the assessment. The filtering process of considering sites is also explained further in the Background Paper Developing Site Allocations ([BGP.002](#)).

All of the sites which were assessed as Suitable, Available, Achievable and capable of delivering 10+ net dwellings are identified within SHLAA Table B ([HEA.004b](#), pages 140-144).

Existing employment sites are included within the SHLAA assessment, as well as being reviewed via the Employment Land Needs Assessment (ELNA), ([ECON.001](#)). Employment sites are included in the SHLAA, because some sites might be developed for mixed use, and some employment sites might have capacity for residential development during the plan period either through change of use or intensification. The findings of the ELNA ([ECON.001](#)) have also been used to inform the assessment of sites in SHLAA, such as updated information about landowner intentions to assess the likelihood for potential change of use from employment to residential. To reduce duplication, employment sites are included in Table A (initial stage of site assessment) of the SHLAA, but they are not then assessed in greater detail in the SHLAA and are instead considered further in the employment evidence base. Mixed use sites which include employment, or employment sites where there is confirmed landowner interest to introduce residential, are shown in Table B of the SHLAA to assess the residential element of its capacity.

All Key Employment Sites (Policy E1: Employment Strategy in [CSD.001](#)) are included in the SHLAA assessment in Table A to review the capacity and deliverability of introducing residential to the site during the plan period through intensification or modernisation. This includes checking landowner intentions and availability of the site for residential development. Through the ELNA ([ECON.001](#)) work, the intentions of the landowners and intended land uses of the Key Employment sites were re-checked and updated in the SHLAA. It would not be practicable or proportionate to include every single non-key employment site that was over 0.25ha in Oxford where there was no expression of interest from the landowner. For example, it would not be proportionate to contact every small business, such as car mechanic garages or small offices

above retail units, unless there had been an indication of interest in developing the site. Those types of sites are only included where there is an expression of interest to develop, such as a planning application, pre-application discussion, or Call for Sites submission. It is important to note that those types of sites are of a size that if they were developed, they would come forward as windfall anyway, and the capacity calculation already includes an allowance for windfall so in this way an allowance is already made for a supply of homes from these types of sites in the overall capacity calculations for the plan.

As such, all reasonable sites have been assessed and considered in the initial stage of assessment in Table A, and those sites that meet the SHLAA tests and are expected to deliver residential development are then assessed in more detail in Table B. However, as noted in the SHLAA ([HEA.004a](#) paragraph 1.4), the assessment is a snapshot in time, based on information available including landowner intention at a given point. It is therefore possible and indeed probable that some sites may come forward that had not been foreseen. This characteristic of the housing land supply in Oxford reflects the nature of typical sites which are developed for housing in Oxford, with the majority being fairly small, brownfield, infill sites or redevelopment of existing uses. This uncertainty is addressed by including a windfall allowance. The overall capacity calculation includes an appropriate windfall allowance for minor sites and major sites. Further information on windfall assessment can be found in paragraphs 3.13- 3.32 (page 30- 35) of the SHLAA ([HEA.004a](#)).

The plan also makes provision for circumstances in which sites in employment use can come forward for housing development. The plan includes policies which would facilitate the delivery of homes on employment sites, where there is a willing landowner, and to ensure efficient use of employment sites (Policy E1 in [CSD.001](#)), with a specific sub-section of the policy titled Loss of employment floorspace and the use of employment sites to support housing delivery. This policy allows for residential on all types of employment sites, so long as on Key Employment Sites it does not result in a net loss of employment floorspace (this is not a requirement for sites not designated as Key Employment Sites).

It is worth noting that the market conditions in Oxford currently make employment development a more profitable and attractive option than residential development. This is quite different than in many areas of the UK. Evidence provided in the Viability Assessment ([SUP.002](#)) demonstrates that in recent years, the characteristics of land values in Oxford have meant that some landowners have been favouring developing sites for R&D use, due to higher returns than would be available for residential development. For example, where sites have come forward recently for redevelopment from existing retail or commercial leisure uses, they have come forward for employment rather than residential use. As such, in the current circumstances it is considered that the potential for sites to move from employment use to residential use is more limited than it might be in other areas. The approach of the plan therefore has been to seek to secure residential development on every potential site. It is recognised that market conditions and preferences do shift over time, if this pattern shifts therefore, the policy framework makes provision for residential uses to be delivered on employment sites (Policy E1 in [CSD.001](#)), further boosting the supply of much needed homes.

Q6 Based on the available evidence, how many new homes are expected to come forward in Oxford over the plan period?

As set out in the Updated Housing Requirement H1 ([CSD.009](#)), at least 9,041 homes are expected to come forward in Oxford over the period 2025-2045. This equates to an average 452 dwellings per annum.

Table 7 (page 36) of the SHLAA Report June 2026 ([HEA.004a](#)), provides a breakdown of how the 9,041 housing supply figure has been calculated. Firstly, it includes completions figures from both major and minor applications in 2025-2026, the first year of the plan period. Secondly, it includes a figure for the identified sites in SHLAA Table B ([HEA.004b](#)) (page 140-144). The sites within this table have been identified through the SHLAA process as suitable, available, achievable, and capable of delivering 10+ net dwellings. The list includes major commitments (sites with a planning permission that will deliver more than 10 dwellings) and site allocations in LP2045.

The assessment of sites in the SHLAA is a combination of evidence and judgement and some sites may not come forward exactly as expected because of, for example, unforeseen circumstances such as economic conditions and site-specific circumstances, while other sites may come forward that had not been foreseen. In response to this and to reflect some uncertainty, it is appropriate and proportionate to apply a 10% non-implementation buffer to the assumed capacity of some of the Table B sites (those sites which are not already under construction or completed).

A further source of the housing supply is minor commitments for the three-year period 2026/27-2028/29, identified from the housing trajectory. These are sites with a planning permission that will deliver less than 10 dwellings net gain. Some of those sites are also listed in SHLAA Table C Sites expected to deliver less than 10 dwellings net gain ([HEA.004b](#)) (pages 145-151) if they were submitted in Call for Sites.

The final component of the capacity calculations is minor and major windfalls. It is considered that there is suitable evidence to justify the inclusion of this in accordance with the NPPF and Government Guidance as set out in paragraphs 3.13- 3.32 (pages 30-35) of the SHLAA Report (June 2026) ([HEA.004a](#)).

Together, these elements make up the capacity calculation for the plan period 2025-2045. It may be that this figure is exceeded, because for example the site allocation policies set a minimum housing requirement not a cap. However, there is not robust evidence that this would be the case or any evidence for the scale of any increase beyond the estimated 9, 041 dwellings, and as such it would not be sound or consistent with the Planning Practice Guidance, to set a requirement based on spurious assumptions.

Q7 What is the housing requirement for the plan period? Is this figure justified and is it clearly set out in the Plan?

The Updated Housing Requirement H1 ([CSD.009](#)) sets a housing requirement of 9,041 new homes over the plan period 2025-2045 (average of 452 dwellings per annum).

This is less than the Standard Method calculation of housing need for Oxford, because Oxford is a physically constrained city and cannot meet all of its own housing needs. The housing needs are significantly greater than the capacity of the city. This principle is long established in the current LP2036 and previous local plans and is explained further in paragraphs 3.3-3.4 of Background Paper Housing Need, Requirement and Mix [BGP.001a](#).

The NPPF recognises that there may be reasons to set a housing requirement that is different to the housing need as calculated by the Standard Method, and that there may be unmet need. The capacity-based figure is justified by proportionate evidence identified in the June 2026 SHLAA Report its supporting appendices ([HEA.004a](#) and [HEA.004b](#)), as well as the work with adjoining authorities to address the unmet housing needs. The June 2026 update supersedes the earlier interim capacity figures: it incorporates 2025/26 completions, updated permissions and landowner information, and identifies total capacity of 9,041 homes. The SHLAA demonstrates that all efforts have been made to identify capacity for housing, and that constraints limit housing capacity.

The City Council engaged closely with the other Oxfordshire authorities throughout the development of the plan, to make sure that the calculations of Oxford's housing need, capacity and therefore unmet need were robust. In particular, as part of this engagement, the City Council worked with adjoining authorities on the production of the SHLAA to ensure that the process was transparent and reliable.

Issue 3 – Maintaining Effective Cooperation

Paragraph 26 of the Framework states that effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

Q1 As part of the Plan’s preparation, how and when did the Council engage with other strategic policy-making authorities on the issue of housing needs and the capacity constraints identified above?

Effective cooperation throughout the plan process

The Cooperation Statement [COM.001](#) gives an overview of cooperation topics and actions up to the point of submission, updated to reflect and demonstrate effective cooperation as a test of soundness and consistency with paragraphs 24-27 of the 2024 NPPF. Effective cooperation has been maintained throughout preparation of the Oxford Local Plan 2045.

Potential strategic matters were first identified early in the plan-making process in the March 2025 Duty to Cooperate Scoping Statement ([COM.019](#)), shared with the identified Duty to Cooperate bodies and published on the City Council's website alongside the Early Engagement Survey ([PCD.003](#)). COM.019 listed the relevant Duty to Cooperate bodies in Section 2 and identified the potential strategic matters in Section 3. These were matters that had potential to be cross-boundary strategic matters. Section 4 sets out mechanisms for cooperation.

A Duty to Co-operate Forum (now the Development Plan Co-operation Forum) was established in June 2025. This monthly forum of Oxfordshire’s Planning Policy Managers covers topics and matters of relevance to cooperation, with the aim of finding solutions and common ground. Throughout, the focus has been on the development of the Oxford Local Plan 2045, in particular discussions around Oxford’s unmet housing need.

The Duty to Cooperate Scoping Statement was updated in October 2025 and published at Regulation 19 stage ([COM.020](#)). This included small amendments in response to comments received at the earlier stage and also added Appendix 1, which was a live list of key duty to cooperate meetings. This was again updated for Regulation 19 in January 2026 (Version 3, [COM.021](#)).

The Memorandum of Understanding with the surrounding Local Planning Authorities about the distribution of Oxford’s unmet need ([COM.003](#)), alongside the Interim Joint Oxfordshire Statement of Common Ground, ([COM.002](#)) as well as the Statements of Common Ground [COM.004-COM.018](#) and the table in Appendix 1 of COM.001 show the outcomes of engagement with relevant parties. A Statement of Common Ground is available for each body relevant to the Duty to Cooperate, except those who did not comment on the Regulation 19 plan and these were submitted alongside the plan. This includes all of the relevant strategic policy-making authorities.

Timing and methods of engagement with other strategic policy-making authorities about housing needs

Early on in the production of the OLP2045 (at the June 2025 DTC Forum) the City Council made the neighbouring districts aware that the intention was to use the Standard Method to inform the housing need and that it was highly unlikely, based on previous work and the outcome of previous plans, that the city could accommodate the entirety of this need. On this basis the calculation of the housing capacity within the city's boundaries was going to be crucial in identifying any unmet need, as was the case with the adopted plan. The City Council therefore engaged in detail with the neighbouring districts on the development of the SHLAA and, as the capacity figure emerged, the implications of this for unmet need.

Table A1 of the LP2045 Cooperation Statement, July 2026 ([COM.001](#)) lists and describes specific engagements between Oxford City Council and other Oxfordshire authorities including the outcomes of the DTC Forum meetings. Appendix 1 of the Memorandum of Understanding (MoU [COM.003](#)) sets out the programme of work proposed by Oxford City Council and agreed by all Oxfordshire authorities to develop a joint position on Oxford's unmet need which resulted in both the Interim Statement of Common Ground ([COM.002](#)) and the MoU itself. In summary this included:

- On 26 February 2025, at the beginning of the local plan process, the City Council held a HELAA workshop with the other Oxfordshire authorities. Methodological details were discussed, including site size threshold and density assumptions. This led to a number of outcomes, including a commitment by the City Council to publish capacity assessments at Regulation 19 ([CAP.001-CAP.053](#)) and to explore site size in more detail.
- On 19 June 2025, a meeting of the Oxfordshire Duty to Cooperation Forum (DTC Forum) was focused on housing capacity, housing need, Green Belt and ELNA. An update was given on the SHLAA methodology and outcomes of the workshop. At this meeting, Oxford City Council confirmed that it would indeed have unmet housing need arising as a result of the capacity assessment.
- On 24 July 2025 at the DTC Forum meeting, the apportionment of Oxford's unmet need was discussed, and the City Council presented a proposed programme of work to get to an agreed position on housing numbers.
- On 19th August 2025 at the Oxfordshire Duty to Cooperate Forum meeting, unmet housing need was a key topic for discussion.
- On 11 September 2025, another SHLAA workshop was held. The presentation from the City Council explained the likely change of plan period (from 2022-2042 to 2025-2045) and resulting updates to the evidence base including on housing need and capacity. The City Council set out new and updated sites, explained the approach to Green Belt, site size threshold and windfall.
- Following the 11 September SHLAA workshop, additional notes were sent to the Oxfordshire authorities, including a list of sites with flood risk issues and notes on those.
- At the 23 September 2025 DTC Forum meeting, the additional note was discussed. At this meeting the timing of the formal request to take housing need was also discussed,

with agreement that it would need to be soon, but when the City Council were as close as possible to a final capacity number.

- On 31 October 2025, the formal request was made to all Oxfordshire authorities for assistance in meeting Oxford's unmet need. This was made by formal letter between Chief Executives (Appendix 1 of [COM.002](#))
- By the 20 November deadline requested in the letter, all Oxfordshire LPAs had responded with a commitment to continuing to provide for Oxford's unmet housing need.
- On 14 November 2025, the DTC Forum meeting discussed an updated programme of work intended to result in an Interim Statement of Common Ground for Regulation 19 of the OLP2045 and a MoU for submission. The meeting also discussed overall supply of housing and unmet need, including identification of sites, the filtering process, the evolution of sites since Regulation 18 and the Call for Sites. Following the meeting the City Council shared a map and list of proposed allocations including assessed capacities and confirmed the methodology.
- On 16 December 2025, a skeleton of the Interim Statement of Common Ground was shared with the districts together with a proforma to gather information in a common format to refine that statement, on each authority's commitment in the adopted Local Plans and intentions for their emerging Local Plans.
- On 18 December 2025, Oxford's draft SHLAA was shared with each of the districts so that they could review it in detail and consider its conclusions.
- By 15 January 2026 all the proformas had been returned, the data collated and used to refine the Interim Statement of Common Ground. Its wording was discussed at the meeting, and agreement was reached for publication alongside the Regulation 19 consultation on 30 January 2026.
- On 26 February 2026 a workshop was held to discuss the SHLAA review.
- In early April 2026, a series of bilateral meetings were held between the City Council and the districts to discuss the Regulation 19 responses and the emerging MoU
- Work on the MoU continued through spring 2026 and culminated in the agreement dated 2 July 2026.
- From the 10 December 2025 meeting onwards, the majority of the monthly meetings of the Oxfordshire Duty to Cooperate Forum (which became the Oxfordshire Development Plan Cooperation Meeting) were focused on preparation of the Interim Statement of Common Ground (agreed and published in support of the Regulation 19 consultation) and thereafter the Memorandum of Understanding (agreed and published at Regulation 20). This included discussion about the strategy for distribution of the unmet need, as reflected in the Interim Statement of Common Ground ([COM.002](#)) and MoU ([COM.003](#))

This programme of work built upon the agreement of the 2016 Memorandum of Cooperation ([OJW.004](#)); which was developed alongside the previous round of Local Plans. The process that led to this earlier Memorandum of Cooperation is explained further in response to Issue 3 questions 2 and 3. Paragraph 3.5 of the 2016 Memorandum of Cooperation states that the agreed apportionment is based upon a common assumed start date of 2021 for the commencement of development, to factor in reasonable lead times. Whilst there has so far been very limited delivery over the ten-year period, a slow start to delivery was anticipated.

However, many sites intended for Oxford's unmet needs now have planning permission or are a significant way through the planning process.

It is still considered that the unmet need can be delivered within the adjoining districts, largely or entirely on sites already earmarked for this. These sites remain deliverable. Significant joint work on infrastructure needs across Oxfordshire has taken place, aiming to identify infrastructure needs to support the proposed level of development, and to identify delivery mechanisms.

Engagement with other strategic policy-making authorities about capacity constraints from infrastructure

The Infrastructure Delivery Plan (IDP [CSD.006](#)) seeks to assess the infrastructure required to meet growth identified in the Oxford Local Plan 2045, when infrastructure interventions are required and how much they will cost. It also provides an overview of funding sources. Infrastructure needs and delivery often crosses boundaries and is provided by third parties there has been cooperation with infrastructure providers about these needs in Oxford as outlined in [COM.001](#). In addition, there has been significant joint working across the county to produce the Oxfordshire Infrastructure Strategy ([EXAM.001a](#) and appendices [EXAM.001b](#)) (referred to in paragraph 2.15 of the IDP).

The Oxfordshire Infrastructure Strategy (OxIS, Aecom, 2026) is an important piece of joint working prepared on behalf of the Oxfordshire Leaders Joint Committee (OLJC). The OLJC is formed of Oxfordshire County Council and all Oxfordshire district councils, so it includes all of Oxfordshire strategic policy-making authorities. OxIS is based on an understanding that substantial growth is expected in Oxfordshire by 2050. Its assumptions fully account for expected housing, economic and population growth (including that in emerging Local Plans) across the county, including Oxford's unmet housing need. Identified strategic infrastructure projects are prioritised and OxIS is therefore a key tool for Oxfordshire authorities to collectively engage with infrastructure providers and government agencies to further delivery.

OxIS looks at transport, energy and utilities, green infrastructure, water, social infrastructure and health and social care. Although the study identifies that electrical infrastructure is constrained in parts of the county to a degree that is creating exceptionally long connection times (particularly in Bicester, where there are no sites for Oxford's unmet need), scheduled upgrades by 2030 will deal with this issue. A significant upgrade the Oxford Sewage Treatment Works is scheduled which enables the works to accommodate population growth projections to 2040, ensuring housing schemes are unlocked (similarly a number of other sewage treatment works have planned upgrades which are critical to unlock planned housing development from 2027 onwards).

Oxfordshire County Council are a key partner in the development of OxIS due to their role (amongst others) as highways authority and local education authority. Working collectively as the county and constituent districts on OxIS ([EXAM.001](#)) has resulted in a more comprehensive and holistic picture for example of the transport measures required and helped the County Council to engage on a wider basis for example through England's Economic Heartland (the Sub-national Transport Body).

The shared understanding of infrastructure constraints and planned upgrades gained through the OxIS work has meant that decisions about housing need across the county are fully informed by what infrastructure upgrades are needed and deliverable in order to achieve it.

Q2 What is the latest (agreed) position between the Council and neighbouring authorities regarding the scale and distribution of Oxford City's unmet housing needs? To be effective, should this be set out in the Plan?

The Memorandum of Understanding dated 2nd July 2026 (MoU [COM.003](#)) builds on the agreement reached in the Interim Joint Statement of Common Ground of January 2026 ([COM.002](#)). Both documents are signed by all five Oxfordshire Local Planning Authorities (LPAs) and focus on the key strategic matter of Oxford's unmet housing need as arising from the draft Oxford Local Plan 2025-2045.

The MoU dated 2 July 2026 ([COM.003](#)) sets out the latest agreed position. It records that Oxford's housing need, using the Standard Method inputs as at May 2026, is 1,078 dwellings per annum (21,560 over the plan period). All parties agree that the June 2026 SHLAA assesses Oxford's capacity and that its details will be subject to examination, but that the assumed capacity of 452 dwellings per annum in the period 2025-2045, is a reasonable working assumption for discussions about unmet need. It is agreed that housing need set against anticipated supply results in a total unmet housing need of 12,519 dwellings between 2025-2045. All of the other Oxfordshire districts agree to help meet this need in their emerging local plans.

Table 2 in the MoU sets out the level of unmet need arising from the Oxford Local Plan 2045 that each other Oxfordshire district has agreed as their apportionment. In total, this is 13,208 units, which exceeds the 12,519 homes that constitutes Oxford's unmet housing need (the response to Issue 3 Q3 sets out in more detail the process that led to this distribution). This is distributed as follows:

- Cherwell 4,400
- South Oxfordshire 4,950
- Vale of White Horse 1,830
- West Oxfordshire 2,028

It is considered that this should be set out in the Plan itself to ensure effectiveness. A modification to H1 and the supporting text is suggested in [CSD.009](#), which also reflects updates to housing need and capacity that happened after the Regulation 19 publication.

Q3 How and where will the unmet housing need generated by the Plan be met? How has the Council engaged with neighbouring authorities on this issue?

There has been continued and effective cooperation throughout the preparation of the OLP2045 on the matter of Oxford's housing need, housing capacity and unmet need. This included

determination of whether and how these unmet housing needs could be met by the surrounding strategic plan-making bodies.

The response to Q1 sets out the timing and methods of engagement with other strategic policy-making authorities about housing needs generally, including the level of housing need, capacity and resultant unmet need. More specifically in relation to formalising how the unmet need is to be distributed, this began with a formal request for assistance in meeting the unmet need made on 31st October 2025 (Appendix 1 of [COM.002](#)). Each district replied to this request and made it clear they agreed Oxford would have unmet housing need and that they were willing to continue to assist by providing for this unmet housing need within their districts (letters attached to [COM.002](#) as Appendices 2-5).

- Appendix 2 of COM.002 shows that Cherwell, in agreeing at its full Council to submit the new Local Plan, committed to saving the policies that deliver the agreed 4,400 homes for Oxford with a spatial strategy focused on proximity and sustainable transport connections into Oxford.
- Appendix 3 and Appendix 4 show that South Oxfordshire and Vale of White Horse respectively think it is very likely that existing provisions in the adopted plan, which are to be maintained in the emerging Joint Local Plan, will be sufficient to meet the unmet need arising from the Oxford Local Plan 2045.
- In Appendix 5 West Oxfordshire states that in principle they accept that a proportion of unmet housing need exists for Oxford in the period 2025-2045 and that they intend to continue to work collaboratively with Oxford and the other Oxfordshire authorities to consider how and where any unmet need might be accommodated.

In terms of how this apportionment was agreed, Section 3 of the MoU ([COM.003](#)) sets out the background to previous cooperation in relation to the last round of local plans, including the previously agreed distribution of unmet need. Section 4 of the MoU explains how unmet need was dealt with in the current adopted local plans. The key principles in paragraph 4.6 explain that the previously agreed apportionment for 2011-2031 remains embedded in the adopted Plans and that there has been no change in the principles behind the distribution of sites that contribute to Oxford's unmet need. The 14,300 figure therefore relates to the earlier 2011-2031 apportionment; it is not an additional 2025-2045 requirement and does not create double counting. The MoU also records that the renewed commitments in emerging Plans total 13,208 homes, exceeding the current 12,519 unmet need for 2025-2045. The basis of the original apportionment remains considered sound and was informed by a programme of joint work on strategic locations and deliverable sites, tested at the respective examinations.

Further detail on the background to the apportionment of Oxford's unmet need is provided in Background Paper [BGP.009](#). It explains in more detail some of the assessments that informed the agreed apportionment in the last round of plan making (which it is agreed is still relevant), including the Green Belt Study (LUC, 2015, [GRE.013e](#)) and the LUC Assessment of Strategic Options (LUC, 2016, [OJW.010](#)), the high-level transport assessment of spatial options (ITP, 2016, [OJW.11](#) and appendices) and the high-level assessment of education infrastructure required to support spatial options for Oxford's unmet housing need (Oxfordshire County Council, 2016, [OJW.012](#)). It also refers to the decision-making process of the Oxfordshire Growth Board Committee (the meeting of September 2016, [OJW.003](#)).

Paragraph 6.2 of the Memorandum of Understanding dated 2 July 2026 (MoU [COM.003](#)) explains that how the unmet need is dealt with by the districts in new or emerging plans is a matter for each district, but that each district is committed to ensuring a sustainable pattern of development, and has developable sites available that will be delivered over the period of the Oxford Local Plan 2045. The earlier figures in the Interim SoCG (21,740 homes of need, 8,202 homes of capacity and 13,538 homes of unmet need) were interim figures based on earlier evidence; the MoU records the updated and agreed figures of 21,560, 9,041 and 12,519 respectively. The earlier figures should not be treated as evidence of a current shortfall.

The Cherwell Local Plan Review 2042 and the South Oxfordshire and Vale of White Horse Joint Local Plan 2041 are both currently at examination. The Regulation 19 consultation on the West Oxfordshire Local Plan 2043 ends on 9th October. The City Council has made representations to all these emerging plans particularly around monitoring of delivery, however, they all include an element of Oxford's unmet need in their housing requirements and allocate the sites and growth areas as identified in the last round of plan-making, as being in locations suitable for meeting Oxford's unmet housing need.

The Interim Joint Statement of Common Ground ([COM.002](#)) sets out detail about the locations in surrounding districts where homes to meet Oxford's unmet housing need are expected to come forward. It gives details of existing and emerging plans. The approach in Cherwell includes specified sites and is summarised in paragraph 24. The approach in South Oxfordshire is summarised in paragraphs 25-26, including the three strategic sites identified in the adopted Local Plan as contributing to Oxford's unmet need. The approach in Vale of White Horse is summarised in paragraphs 27-28, including a list of the sites in the Abingdon-on-Thames and Oxford Fringe Area. The approach in West Oxfordshire is summarised in paragraphs 29-30, including the sites allocated to contribute to Oxford's unmet need (Salt Cross Garden Village and West Eynsham SDA). The Proformas in Appendices 6-9 of the Interim Joint Oxfordshire Statement of Common Ground set out more detail.

Issue 4 – Affordable Housing Needs and Provision of Affordable Homes

Q1 What is the need for affordable housing over the plan period and where is this set out?

The Updated Specialist Housing Needs Assessment (2025) ([HEA.001](#)) includes an assessment of the need for affordable housing and a projection of the likely future needs in the plan period. The assessment indicates an overall calculation of affordable housing need of 692 dwellings per annum (dpa) across the city (paragraph 4.27 of [HEA.001](#)). Across the plan period of 2025-2045 this totals 13,840 (692dpa x 20 years).

The calculation applied in the assessment follows the approach in the PPG as follows:

Net Need = Current Need (allowance for) + Need from Newly Forming Households + Existing Households falling into Need – Supply of Affordable Housing

The assessment also considers wider factors such as the type of affordable housing - to rent or to buy, and different types of rented affordable housing products (social rent, affordable rent).

To ensure effectiveness, the affordable housing need could be brought into the plan, with the following modification:

As a new second bullet point in the ‘Policy Context’ supporting text to Policy H2, add:

The affordable housing need is 692 dwellings per annum (or 13,840 dwellings over the plan period).

The plan’s Monitoring Framework [CSD.001](#) (pages 334-337) indicates that this important aspect of housing need will be monitored through the Authority Monitoring Report.

Q2 Based on the housing requirement in the Plan, and the thresholds set out in Policy H2, how many affordable homes are expected to be provided over the plan period?

Affordability (or unaffordability) of housing for people living in Oxford is a key issue to address in the Oxford Local Plan 2045 (LP2045) and is also a corporate priority of the City Council more broadly. As such it is a key policy approach in the Plan to deliver much-needed affordable housing, and securing new affordable housing as part of larger developments is a significant way that more affordable homes can be provided in Oxford.

Policy H1 Housing Requirement (in [CSD.001](#)) sets out the overall housing requirement in the Plan of 9,267 dwellings, with a proposed modification to 9,041 dwellings in [CSD.009](#). The thresholds for sites to make affordable housing contributions are set out in policies H2 Delivering Affordable Homes and H3 Affordable Housing Contributions from other Development Types (both [CSD.001](#)).

Policies H2 and H3 both have qualifying criteria and thresholds, therefore determining the number of affordable homes expected to be provided over the plan period is subject to several

variables and is therefore more complicated than simply applying a percentage calculation to the overall H1 housing requirement set out in H1. These variables include:

- The final numbers of units are not yet known for most site allocations as they set a minimum housing number expected to be delivered on the site, not a cap. These minimum numbers can be exceeded if a suitable proposal comes forward, so the final exact total number of homes on a site would not be known until planning application stage because it will be affected by the design and layout of the site and the mix of other uses on the site;
- The final type of residential use is not confirmed for some sites until the planning application stage. Some site allocations specify residential development, but some allow flexibility for the residential to include either student accommodation and/or employer-linked housing. This affects the final number of affordable homes delivered because if the site gets developed for student accommodation, then the affordable housing requirement would be delivered via financial contributions towards affordable housing off-site, rather than direct provision of affordable housing. Similarly, if the site is developed for employer-linked housing this is addressing an affordable need but only for employees of that employer, so is different to meeting wider affordable needs;
- Some sites may be exempt from affordable housing contributions, such as those that come forward under permitted development rights, in particular office to residential conversions or university campus sites (exemptions set out in Policy H3).
- Policy S4 Plan Viability ([CSD.001](#)) may apply to some developments depending on economic circumstances at the time of the development. Whilst the plan viability assessment indicates that the majority of site typologies tested are likely to be viable, there may be specific case by case exceptions, which can justify a lower level of affordable housing contributions (Policy S4 Viability);
- Some sites may exceed Policy H2 requirements and deliver higher levels of affordable housing even up to 100% affordable housing, if the landowner for example, secures grant funding from Homes England or other partners. This has been the case in recent years on some City Council owned sites;
- The total capacity calculated for the plan period includes an assumption that major (10+ dwellings) windfall sites will deliver approximately 55 dwellings per year on average SHLAA Report ([HEA.004a](#)). Some of these may deliver affordable housing under the requirements of Policy H2, and some may fall under the exemptions discussed above, such as office to residential conversions.

For these reasons, it is not possible at the plan-making stage to forecast a precise number of affordable homes that will be delivered during the plan period. However, some broad assumptions can be made to provide some estimates, as summarised in Table 1 below. For sites which have planning permission, the number of affordable homes expected to be delivered according to the Section 106 legal agreement, can be calculated with the greatest level of certainty. LP2045 has a start date of 2025 so some sites have already been completed in 2025/26. There is a possibility that some planning permissions may not be implemented, or that amendments may be submitted. Also note that several of these sites are being developed for student accommodation, so would not be providing onsite affordable housing. Depending

on if they meet the exemptions under H3 they would either be providing financial contributions towards affordable housing or would be exempt from contributions.

A broad estimate can also be calculated for sites which have a site allocation policy in LP2045 solely for residential development (Use Class C3), by assuming 40% of the minimum housing requirement for each site is delivered as affordable housing (and 50% for the one site allocation which is in the Green Belt). For these sites, a higher total number of dwellings may be proposed at planning application, or applicants may choose to exceed the policy requirements, or in rare cases may make a viability case to deliver less than the policy requirements.

The remaining sites, where the site allocations allow flexibility for student accommodation and/or employer-linked housing, there are too many variables at the plan-making stage to make a reasonably-informed estimate about how much affordable housing might be delivered from those sites.

Table 1 – broad assumptions about delivery of affordable housing from known sites expected to deliver residential development during plan period 2025-2045

Category of site in SHLAA Table B (sites in the overall plan capacity calculation)	Number of sites	Number of affordable housing units expected
Sites with planning permission (includes sites under construction, completed within plan period, and sites with resolution to grant)	34 (of these 34, 15 were sites delivering student accommodation, so no onsite affordable housing delivered – either exempt from H2 or offsite financial contributions, plus 1 prior approval which also did not provide affordable housing)	Expect 1350 affordable homes
Sites with site allocation for only C3 residential, so would qualify for affordable housing provision onsite under H2	20	Anticipate 682 affordable homes from sites delivering 40% Plus 10 from 1 site delivering 50%
Sites with too many variables to estimate affordable housing likely to be delivered: site allocations which allows for student accommodation, employer-linked housing, or where no minimum housing requirement is specified due	28	Too many variables about the type of development and whether it will be subject to an affordable housing contribution

to operational hospital uses, and any major windfall sites		
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Alongside measures in LP2045 to deliver affordable housing, the City Council also has a corporate commitment to directly build 1600 affordable homes between 2023 – 2028 ([Housing, Homelessness and Rough Sleeping Strategy 2023 – 2028](#)). In the [2025/26 progress report](#) for the Strategy, it reports that number is likely to be exceeded, with forecasts of 1,632 affordable homes during that period, including 1,072 for social rent (against a target of 850). The Strategy is due to be updated later in 2026 but the corporate commitment to directly delivering affordable housing remains and will help to ensure delivery alongside LP2045.

A further indication of the likely amount of affordable housing delivery, is to look at past delivery rates in the Authority Monitoring Report. This needs to be viewed in the context that there is a different policy requirement in LP2036 (50% affordable housing on qualifying sites) and similar to LP2045 there are various exemptions such as exempt student accommodation sites, office to residential permitted development, which will either not provide affordable housing contributions or would be via financial contributions.

Table 2 below extracts the relevant data from the 2025/26 Authority Monitoring Report (AMR). Note at the time of writing, the 2025/26 AMR is not yet published. It is due to be considered by Oxford City Council's Cabinet at its December 2026 meeting, as such the final row and totals are shown in italics as not yet confirmed.

Table 2 – Net additional dwellings completed broken down by housing type, since the start of the Local Plan 2036 plan period

Year	Housing Type					Total dwellings completed (net)
	Market Dwellings Completed	Affordable Dwellings Completed	Student Rooms Completed (Number of Equivalent 'dwellings') See table 15 for details	Care Home Rooms Completed (Number of equivalent 'dwellings')	Other communal accommodation Completed (Number of equivalent 'dwellings')	
2016/17	284	20	295 (118)	-6 (-3)		419
2017/18	170	17	452 (180)	0(0)		367
2018/19	158	105	187 (75)	36 (20)		358

2019/20	118	104	1337 (535)	59 (33)		790
2020/21	322	144	628 (251)	-11 (-6)		711
2021/22	243	274	131 (52)	-13 (-7)	34 (19)	581
2022/23	142	273	266 (107)	0 (0)	57 (32)	554
2023/24	280	61	84 (34)	0 (0)	-18 (-10)	365
2024/25	179*	70*	55 (23)	0 (0)	0 (0)	272
2025/26	204	346	316 (150)	0 (0)	0 (0)	700
TOTAL:	2,100	1,414	3,751 (1,525)	65 (37)	73 (41)	5,117

* Note the no. of market and affordable dwelling completions was incorrectly recorded in 2024/25 - the market dwellings figure should have been 179 (not 174) and the affordable dwellings figure 70 (not 75) as shown in the table above.

The monitoring data illustrates that, similar to the patterns with overall housing completions in Oxford, the number of dwellings varies from year to year reflecting the nature of the housing land supply in Oxford. Whilst those developments were brought forward under a different policy context (of 50% contributions), the analysis of past trends does suggest that the level of affordable housing delivery during LP2045 is likely to exceed the calculations in Table 1 above, because the past trends data also incorporates scenarios such as delivery through windfall unidentified major sites, sites which have delivered at greater than policy requirements, and additionality of affordable housing through registered providers purchasing additional units.

Monitoring of affordable housing delivery will continue through the AMR. The Monitoring Framework (page 334 of [CSD.001](#)) identifies Policy H2 as a specific monitoring indicator and records net permissions and completions of affordable housing. This monitoring process ensures that the effectiveness of the policy can be continually reviewed.

Q3 How have affordable housing needs been considered through effective engagement with neighbouring authorities?

There is a long history in Oxfordshire of effective cooperation on housing matters, with the most recently adopted suite of Local Plans in Oxfordshire based on a joint assessment of housing need and an apportionment of, and provision for, Oxford's unmet need. Work with the other Oxfordshire authorities has resulted in provision being made within the plans of our neighbours, including a number of strategic allocations, to help meet Oxford's housing need. Alongside this, but outside the planning system, the respective housing teams of the Oxfordshire authorities secured agreements on the nomination rights and processes for allocating affordable homes delivered as part of Oxford's unmet need. A renewal of these provisions has

been agreed and details of progress made towards delivery is set out in the Memorandum of Understanding between the Oxfordshire authorities ([COM.003](#)).

As work has progressed on this Local Plan, there have been monthly conversations between the Oxfordshire authorities on the likely level of Oxford's unmet need and the commitments of the neighbouring authorities to assist with this. In addition to the regular Oxfordshire Planning Policy Officers and Heads of Planning meetings the City Council took the initiative in Spring 2025 to set up a Duty to Co-operate Forum. It is through the work of the Duty to Co-operate Forum that the Interim Statement of Common Ground ([COM.002](#)) was agreed and published at Regulation 19 stage and the Memorandum of Understanding ([COM.003](#)) was agreed and published at submission of the OLP2045.

Whilst the wider conversations largely focused on the overall level of need, Oxford's capacity and the level of unmet need, they also touched on the issue of affordable housing, centering around the intended reduction in affordable housing in Oxford (driven by the viability evidence feeding into the Local Plan) and any consequences for the requirements for affordable housing from the agreed unmet housing need. More specifically, South Oxfordshire and Vale of White Horse District Council raised concerns with Icenis being commissioned to carry out the Specialist Housing Needs Assessment (at the Duty to Cooperate meeting on 24th April 2025, Table A1 of [COM.001](#)). At Regulation 18 they raised a number of concerns, some of which were about differences of approach between respective consultancies, which are summarised and responded to in the Consultation Report ([CSD.003](#), see page 159-163). At Regulation 19 they responded to say they have a number of concerns with this report (around the transparency of data sources and methodology) that remained unresolved.

In addition, the City Council has been actively engaging with the neighbouring authorities on their Local Plans in order to seek additional security around the delivery of homes, and in particular delivery of affordable homes, to meet Oxford's unmet need, and the monitoring of such. The issue of affordable housing delivery has been a key one in the representations the City Council has made to the examinations of the South and Vale Joint Local Plan 2041 of the Cherwell Local Plan Review 2042, and the Regulation 19 consultation on the West Oxfordshire Local Plan 2043.

At the recent South and Vale examination we sought, amongst other matters, a change to the Joint Local Plan to: *"Ensure that sites are specified as being intended for (or in part intended for) Oxford's unmet need, in order that the affordable housing units secured are available for those on Oxford's housing register, and so that delivery can be monitored"*. At the Cherwell Local Plan Examination we noted that *"Cherwell have accepted that monitoring the delivery of the saved Partial Review sites is important and that they agree this can be done in the CDC Annual Monitoring Report. This is welcome, but an informal commitment. Additionally, both councils have signed a Nominations Agreement for the affordable homes to be delivered on these sites, this also offers a partial monitoring solution. The City Council considers that whilst both of these mitigations assist, they are a poor substitute for the current approach in the adopted Plan which treats Oxford's unmet need as a separate entity."* The picture is similar at West Oxfordshire, where the MoU records the corresponding West Oxfordshire commitment to provide 2,028 homes towards Oxford's unmet need in 2025-2043 at Salt Cross Garden Village and West Eynsham, with continued cooperation on delivery and monitoring, but

representations at Regulation 19 note that the emerging plan does not have such strong mechanisms to ensure delivery in the right way for Oxford's unmet need as the extant plan.

Q4 Policy H2 requires a “minimum” of 40% affordable housing on qualifying sites (and a minimum of 50% on sites in, or released from, the Green Belt). Is the Plan sufficiently clear how much affordable housing is required from development proposals? Is it effective?

The Plan clearly sets out the policy requirements about how much affordable housing is required from different types of developments. The affordable housing contribution policies (Policy H2, Policy H3, Policy H4 and Policy H5 in [CSD.001](#)) indicate the level of affordable housing contribution that is required, and whether it is required to be provided onsite or as financial contributions towards provision off-site.

Appendix 2.1 of [CSD.001](#) (page 308) sets out the method for calculating affordable housing contributions. Note that, development proposals can exceed these policy requirements, for example to provide 100% affordable housing on a site.

The City Council is confident that the policies will be effective. Viability testing ([SUP.002](#)) indicates the levels of contributions set out in these policies are viable for the majority of development typologies likely to come forward during the Plan period in Oxford. However, provision has been made for some flexibility, only where there are exceptional circumstances that mean viability is a challenge. Policy S4 ([CSD.001](#)) sets out a clear process for applicants in the event that there are viability challenges to delivering a site. In those circumstances, Policy S4 ([CSD.001](#)) sets out a cascade of adjustments that proposals should work through until the site becomes viable. Policy S4 sets out through the stepped cascade approach, that the retention of affordable housing delivery will be prioritised over other policy considerations if viability becomes an issue affecting delivery.

These policies are deliverable and flexible, and as such are considered effective. The City Council has a good track record of delivering affordable housing, see Table 2 (Matter 2, Question 2) above.

Q5 What is the justification for the 40-50% split in Policy H2? Is this justified and does it adequately reflect the typologies tested in the Local Plan Viability Assessment?

The City Council has taken a practical and pragmatic approach to setting the requirements for affordable housing in the plan. Previous Local Plans have set a requirement of 50% affordable housing as the evidence showed that this would be viable at the time. In the evidence base for the 2045 Local Plan this level of requirement was not shown to be viable on a significant proportion of site typologies, so the City Council has taken the difficult decision to reduce the requirement in this plan.

The proposed 40-50% split in Policy H2 is justified and reflects the typologies tested in the Local Plan Viability Assessment. Policy H2 ([CSD.001](#)) sets out that, for qualifying developments, a minimum of 40% of units on the site should be provided as homes that are truly affordable in the context of the Oxford housing market. On sites in the Green Belt or released from the Green Belt, this should be a minimum of 50%. The uplift for sites in the Green Belt arises from the NPPF paragraph 67 (2024 version) requirement that development in the Green Belt should, as part of the “Golden Rules” provide greater levels of affordable housing of at least 50% affordable housing, unless that would make the development of these sites unviable. More details are set out below. The requirement in H2 meets this definition in the NPPF.

The [Planning Practice Guidance](#) advocates that a typologies approach is appropriate for determining viability at the plan making stage, and that assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable (Planning Practice Guidance on Viability, Paragraph: 003 Reference ID: 10-003-20180724). The Viability Assessment for LP2045 applies typologies approach consistent with national policy and guidance.

There are 30 different development typologies tested in the assessment, to compare the residual land values. They include non-residential uses including offices/R&D, retail, industrial, and community uses, whilst the residential typologies cover a range of types of sites from small to large, greenfield/brownfield, flats and houses (Typology Details, Appendix 2 of [SUP.002](#)). The typologies were identified from analysis of recent past developments and the types of sites/developments expected to come forward in Oxford over the life of LP2045. Each typology is tested against varying levels of affordable housing contributions (from 0% to 50%), other emerging policy requirements, and indexed CIL rates, to a range of benchmark land values as indicative values of sites prior to redevelopment ([SUP.002](#)).

Different benchmark land values are used, including greenfield undeveloped land (which can be expected to apply to nearly all Green Belt sites) along with a range of different brownfield site benchmark land values. There are variations in the percentages of affordable housing that can be provided from different typologies of sites, reflecting variations in private sales values, scheme composition (i.e. flats or houses), and benchmark land values (Appraisal Results, Appendix 6 of [SUP.002](#)). In general, greenfield sites (benchmark land value typology 4 “greenfield/undeveloped land”), show viability for 50% affordable housing contributions, across most residential development types, even in areas of the City with the lowest sales values (£4, 345 psm). This is not the case for secondary industrial (the next most viable benchmark land value), but there are viable residential typologies in areas with the lowest sales values with 40% affordable housing.

In setting the levels in the developer contributions policies, LP2045 seeks to balance maximising the community benefits from developer contributions but without undermining the delivery of sites/the Plan; and to set the levels so that most schemes can viably deliver the policy requirements, whilst also retaining some flexibility to take site-by-site circumstances into account where necessary (but this should be only a minority of schemes, in order to not add unnecessary complexity or delays to the development management process). This is also explained further in Affordable Housing Background Paper ([BGP.002](#)).

There are large differences in terms of the level of affordable housing that can viably be provided, depending both on the area and also the different BLVs. When tested against the highest benchmark values (secondary office and secondary retail uses), many schemes are unviable even with very low levels of or even no affordable housing. It is clear that some BLVs are highly unlikely to come forward for housing of any type in the current economic climate, so attempting to set affordable housing levels very low to make these BLVs viable in only some areas is not a sensible approach. Instead, the focus has been on setting affordable housing at a level viable for most types of schemes in most areas for the BLVs that would viably deliver housing (i.e. secondary industrial and greenfield/undeveloped sites, rather than secondary retail and secondary offices).

The 40-50% split is justified because it reflects the viability evidence and the expectations of the NPPF and PPG. It is also effective because it sets a clear but achievable expectation. A good proportion of brownfield BLV could deliver 40% affordable housing, but fewer brownfield BLV can deliver 50% compared with greenfield. This does vary depending on the sales values, but dividing up the city to have differing policies across different parts of the city (as a densely built up and small geographic area) would be an unnecessarily complex policy approach, introduces more uncertainty to the development management process, and risks skewing the distribution of growth in the city. In order to have a robust policy threshold for the whole city, we have applied a "maximum reasonable proportion". Setting a target of 40% on all sites other than Green Belt seeks to maximise affordable housing delivery whilst also setting a clear policy expectation and reducing uncertainty in the development management process for developers and communities.

Issue 5 – Older People and Student Accommodation Needs

Q1 What is the need for specialist housing for older people over the plan period? Is this set out in the Plan?

Table 7.3 of The Oxford Updated Specialist Housing Needs Evidence (Iceni, 2025, [HEA.001](#)) (which expands on the Oxfordshire County Council Specialist Housing Need Assessment 2024) gives an up to date picture of the need for supported housing in Oxford. The assessment identifies a need in Oxford to 2045 of 1,029 additional sheltered/retirement housing units (412 social/affordable rent, 102 shared ownership, 515 market). It also identifies a need for 322 extra care units (152 social/affordable rent, 24 shared ownership, 152 market).

Paragraph 5.26 of Iceni's report details that nationally, the population is aging, and whilst Oxford has a younger than average age profile of residents (12% aged 65+ compared to 19.8% in the South East, 2024, ONS), the population of those 65+ in Oxford is expected to grow by around 35.9%-38.7% by 2045 (representing 7,336-7,905 additional people in this age range).

An explanation of the proposed policy approach, informed by this evidence, is set out in Appendix A of Background Paper 003 ([BGP.001c](#)) which covers Older Persons Accommodation and other types of specialist housing need. There are very few sites in the city large enough to deliver a supported housing facility for sites of a large enough capacity. Compared to a higher need for other types of housing within the city, the delivery of older persons and other specialist accommodation is unlikely to be predictable enough to enable an allocation, and the policy approach taken is therefore permissive. For these reasons, Policy H14 is focused on providing criteria to guide where and how older persons and other specialist housing comes forward. The approach was discussed and agreed with Oxfordshire County Council as the plan was prepared, and consequently they have no comments to raise on this approach in their representation.

To ensure effectiveness, the supported housing need could be brought into the plan, with the following modification:

As a new second bullet point in the 'Policy Context' supporting text to Policy H9, add:

The need for sheltered/retirement housing units to 2045 is 1,029 (412 social/affordable rent, 102 shared ownership, 515 market units). The need for extra care units to 2045 is 322 (152 social/affordable rent, 24 shared ownership, 152 market).

Q2 How does the Plan ensure that the needs for older persons accommodation will be met over the plan period?

Provision of new extra-care and elderly persons' accommodation is generally supported by the policy approach. The policy criteria are intended to ensure that supported accommodation is well designed, with good access to local facilities, and that it is well integrated into a mixed community.

The intention of the emerging plan has been to continue the generally supportive approach of Policy H11 of the Oxford Local Plan 2036. This was supported by the County Council. It is recognised that, to be viable, specialist housing needs to be of a reasonably large size, so that there are enough rooms to accommodate the on-site staff and facilities. Because of the lack of large sites in Oxford, there are limited opportunities to include a requirement that part of a site be allocated specifically for this use. There was no landowner interest in a site being allocated specifically including when we specifically asked through the Call for Sites for this use. Therefore there were no sites with landowner interest and no identified sites with potential for a minimum viable size of facility exist to enable a sound allocation. The City Council is aware however that at least one of the sites allocated for Oxford's unmet housing need within Cherwell (PR9) has planning approval including 9,000sqm of extra care housing. In addition, the draft policies South Oxfordshire and Vale of White Horse Joint Local Plan incorporate an element of extra care housing on a number of strategic sites which are anticipated to meet Oxford's unmet housing need, adjoining Oxford's boundaries.

There is a lesser need for additional affordable housing types of specialist accommodation compared to market specialist accommodation. As the greater need is for market specialist accommodation, it is expected that the market will respond by bringing forward specialist housing types where opportunities do arise; the plan is framed to support that with a permissive and criteria based policy approach.

Another aspect of Policy H12 is that existing specialist care accommodation should be protected unless it is to be replaced elsewhere or unless it can be shown that it is surplus to requirements. Given that there is additional need for this accommodation over the plan period, and limited sites where it can be delivered, it is important to retain existing provision, especially existing sites which offer potential for intensification, which may also help to meet identified needs.

The plan's Monitoring Framework [CSD.001](#) (pages 334-337) indicates that this important aspect of housing need will be monitored through the Authority Monitoring Report.

Q3 What is the need for student accommodation over the plan period? Is this set out in the Plan? *and*

Q4 How does the Plan ensure that the needs for student accommodation will be met over the plan period?

The Plan sets out an overall housing requirement in Policy H1 that seeks to meet the housing need as far as possible, including for those groups such as students with specific housing requirements. However, the housing need in Oxford is far greater than the capacity of the city to deliver it. Therefore, needs must be balanced, including the needs for different types of specialist accommodation.

There are several factors to consider when assessing the need for student accommodation. The accommodation needs of students vary greatly, and it is not simply a case of trying to identify

any increase in the number of students who will be in the city. The need varies depending on the type of institution the student is attending, and the circumstances and personal preferences of individual students. The Oxford Student Needs Assessment (Iceni, 2023, [HEA.002](#)) found no significant need for additional student accommodation for students at institutions other than the universities over the plan period. For example, many language school students only attend for a short duration and are usually accommodated in homestays or student halls that are vacant in the summer.

The City Council has worked closely with the universities to understand student growth dynamics and the growth ambitions of those institutions. [HEA.002](#) (2023) provides high and low-level growth scenarios for how they envisage the number of students to change going forwards. The Updated Housing Specialist Needs Evidence (Iceni, 2025, [HEA.001](#)) confirmed that further monitoring since that was carried out has indicated that the universities have tracked at the low growth scenario as developed in 2023 and not the high growth scenario, therefore the lower scenario has been used to anticipate student growth needs for the Plan Period. It is acknowledged that anticipated growth beyond five years is more broad brush; the universities have confirmed that they are unable to accurately forecast growth beyond this period. The reasons for this are that student accommodation needs can vary year on year but can also vary due to external macroeconomic factors which cannot always be predicted, for example future government policy in respect of the Higher Education sector, and changes to immigration/ visa requirements.

Therefore, for these reasons, there is not a specific need or requirement in the Plan set out for student accommodation. As explained above, is impossible to ascertain in any meaningful sense, and it is instead it is more important to try to understand how the picture may change over time and to have a policy approach that manages this, yet that is sufficiently flexible to respond. Work has been undertaken by Iceni in 2023 and 2025 ([HEA.002](#) and [HEA.001](#) respectively) to try and forecast growth for the student population and to ascertain which ones will need student accommodation. The overall approach aims to ensure that the policy is sufficiently flexible to allow for needs to be met.

Paragraph 63 of the NPPF 2024 states that establishing need for different groups in the community, including students, should be assessed and reflected in planning policies. Under the guidance within “[Housing Needs of Different Groups](#)”, the PPG reinforces this point and notes that strategic policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. National policy and guidance also note that encouraging more dedicated student accommodation may provide low-cost housing that takes pressure off the private rented sector and increases the overall housing stock.

It has already been established in Policy H1 that Oxford cannot meet its housing needs in full. As a consequence, those sites that are available are competing not just between different types of uses, but also between housing for the needs of different groups. The Plan therefore has to carefully balance which sites are most suited to general market and much needed affordable housing, as well as groups with specialist housing needs, such as students. Whilst providing purpose-built student accommodation can take the pressure off the housing market, that type

of development would also occupy a site that may be more suited to market and affordable housing, particularly when available sites in the city are so limited. The policies in the plan aim to achieve that balance.

Another important element of the plan's strategy in dealing with specialist student needs is Policy H9. This allows the Higher Education institutions to grow, providing that they also increase the amount of university-owned or managed accommodation if demand is created, in line with the thresholds set in Policy H9 and the locational requirements of Policy H8, which also encourages the use of each universities' own landholdings for the development of student accommodation and education space. These policies have been designed to support the sustainable growth of the Universities, providing enough flexibility to respond to changing needs, whilst recognising the competing demands for land in Oxford City.

[HEA.001](#) and [HEA.002](#) identify a flexible supply of student accommodation through schemes in the pipeline with planning consent, sites allocated wholly or partly for student accommodation, and potential windfall sites. However, [HEA.001](#) also identifies a potential shortfall by 2033/34 of approximately 3,000 beds for the University of Oxford and 5,600 beds for Oxford Brookes under the low-growth scenarios. It should be noted that this cannot be read as a simple statement of need. For the reasons outlined above, a simple assessment of the need for student accommodation is not possible. Housing in Oxford is highly complex, and these numbers represent purely an expectation that there will continue to be students with a student accommodation need living outside of university-provided accommodation. This is the case now, has always been the case, and will continue to be the case. The Plan therefore does not set a fixed student-accommodation requirement; instead, it uses the evidence to manage delivery over time through the locational controls in Policy H8 and the accommodation thresholds and monitoring requirements in Policy H9.

Monitoring will be undertaken through the Authority Monitoring Report (AMR). The Monitoring Framework identifies Policy H9 as a specific monitoring indicator and records planning permissions granted for student accommodation and for academic, research and administrative facilities. This monitoring process ensures that the effectiveness of the policy can be continually reviewed and that academic growth remains appropriately aligned with student accommodation provision throughout the plan period. Note the 25/26 AMR is not yet published and is due to be considered by Oxford City Council's Cabinet at their December 2026 meeting.

Issue 6 – Employment Land Needs – Policy E1

Q1 How have the employment floorspace needs in the supporting text to Policy E1 been established? Are they robust and based on appropriate available evidence?

The employment floorspace needs as set out in the supporting text to Policy E1, are based on the findings from the Oxford City Employment Land Needs Assessment (Rapleys, January 2026) ([ECON.001](#), hereafter "the ELNA"). Chapter 6 on pages 45-59 (46-60 of the PDF) of the ELNA, sets out the PPG compliant approach to establishing the employment floorspace needs.

The ELNA follows a standard quantitative approach, guided by the Planning Practice Guidance Note and considers labour demand, labour supply and past trends. This is supported by extensive qualitative market facing data which included 1:1 discussions with major landowners and local property market agents. In addition, consultation with stakeholders was held in June 2025 and a workshop with the other Oxfordshire authorities was held in July 2025. Both of these engagements were used to share and discuss the emerging quantitative conclusions of the ELNA prior to completion of the work and the refinement the policy approach of the plan in response

The floorspace need figures were derived from the jobs growth associated with each land use category explained at paragraph 6.79 on page 59 (PDF page 60) of the ELNA ([ECON.001](#)). Table 6.6 on page 55 (PDF page 56) of the ELNA ([ECON.001](#)) sets out the "favoured" need assessment approach for each land use, while paragraphs 6.54-6.60 on pages 55-56 (PDF pages 56-57) of the ELNA ([ECON.001](#)), present the findings, conclusions and justification for the selection. A short discussion of each aspect of the approach is presented below.

The identified 21,370sqm of office need was derived from a 2025 Oxford Economics forecast and adjusted for committed losses and vacancy. Details showing how the office need was calculated are set out in Table 6.4 on page 53 (PDF page 54) of the ELNA ([ECON.001](#)). Office need was calculated using a labour demand approach.

The identified 345,004sqm of R&D floorspace need is based on past trends (job delivery) over the 12-year period from 2012-24. This 12-year past job change scenario, reflected higher market signals and showed a greater change than either the labour demand forecast or the past trends (floorspace delivery). It also reflected the very large pipeline of R&D space with (or seeking) planning permission. See Table 6.2 on page 51 (PDF page 52) of the ELNA ([ECON.001](#)) for more details. R&D need was calculated using the past trends - job delivery approach.

A zero floorspace of industrial need is based on low/negative past trends and low/negative job growth. Evidence of positive market signals and strong support for manufacturing in national policy, meant that the negative Oxford Economics Labour Demand forecast, with adjustments for market signals, resulted in a floorspace need of zero. The ELNA considered that this was appropriate as a declining national manufacturing economy did not appear to align with wider national priorities, while declining employment in the manufacturing sector may not release floorspace due to automation. (See paragraph 6.60 on page 56 (PDF page 57) of the ELNA ([ECON.001](#)) for further details.

The identified 46,086sqm of warehousing need was based on the Oxford Economics labour demand forecast and reflected market signals for small, local scale, mainly population and business servicing demand. The ELNA recognised that although there were negative past trends (see Table 6.1 on page 47 (PDF page 48) of the ELNA ([ECON.001](#)) relating to floorspace delivery; and Table 6.2 on page 51 (page 52 of the PDF) of the ELNA ([ECON.001](#)) for past trends in job delivery), these did not reflect the market signals.

The ELNA ([ECON.001](#)) estimated that the economic need conclusions generated 28,050 new jobs across all sectors. These conclusions included job growth in non-employment land sectors. These sectors include non-traditional B Class jobs and are made up of sectors such as retail, leisure, health, education etc.).

Finally the ELNA ([ECON.001](#)) was sense-checked for alignment with labour supply evidence, using data provided by Icení (who had provided demographic forecasts as part of the Updated Specialist Housing Needs Evidence (Dec 2025), ([HEA.001](#))). The total number of jobs forecast for Oxford for the plan period 2025-45 was in the middle of the two narrow Census-based labour supply scenarios developed by Icení. (See Table 6.7 on page 56 (PDF page 57) of the ELNA ([ECON.001](#)), which duplicates Table 2.13 on page 26 (PDF page 29) of the Updated Specialist Housing Needs Evidence ([HEA.001](#))).

There was less than 15% variation between two demographic (Census-based) labour supply scenarios, depending on whether 2011 or 2021 commuting rates were used. Using the Census 2021 commuting rates resulted in a labour supply of 25,561, while the Census 2011 commuting rate – the Icení preferred demographic scenario – gave rise to a labour supply of 29,011.

Given uncertainties associated with demographic (and economic) modelling, the ELNA ([ECON.001](#)) considered that homes and jobs proposed were broadly in balance and that no further adjustments for labour supply were warranted. As such, the ELNA supports the Plan's approach.

To summarise, the ELNA ([ECON.001](#)), in calculating employment floorspace needs, (which are presented in the supporting text to Policy E1), followed a standard PPG approach that blended quantitative and qualitative evidence of 'need'. The findings, which have been checked via market engagement and consultation, were also sense-checked with the demographically derived labour supply, as provided by Icení, and contained within the Updated Specialist Housing Needs Evidence. The approach taken to establishing employment need is therefore considered to be robust and proportionate.

Q2 The Oxford City Employment Land Needs Assessment (paragraphs 8.21-8.23) states that the considerable need for research and development space can be met from commitments and 'potential supply that has been promoted to the Council'. What are the sources of 'potential supply' and how does the Plan ensure that they will contribute towards identified needs?

At the time of drafting the ELNA ([ECON.001](#)), there was already a pipeline of R&D floorspace. This was made from two sources – a confirmed supply (which consisted of sites benefitting

from planning permission) as set out in Table 7.1 (on page 62 (PDF page 63)), and a potential supply.

The potential supply was made up of sites that the City Council was aware that were being promoted, and on which the principle of R&D could be supported. However, at the time the ELNA was being drafted, as these sites had not received a formal grant of planning permission, they could not be considered alongside the confirmed supply.

The City Council was generally minded to accept the principle of R&D at these sites and formal planning applications were being progressed for most of them. However, as with any planning application, there is a risk that it could be refused, or even withdrawn by their respective promoters when subject to detailed consideration. This could result in a different mix or quantum to that suggested at the time the ELNA was drafted. The ELNA ([ECON.001](#)) therefore presented Oxford's best understanding of these sites at the time (i.e., as at October 2025), and made it clear they only represented potential supply (Table 7.2 on page 63 (PDF page 64) ([ECON.001](#))).

Q2 (cont.) How does the Plan ensure that they will contribute towards identified needs?

The evidence, as presented in the ELNA ([ECON.001](#)) shows, at Table 8.1 on page 67 (PDF page 68), that the confirmed supply of R&D floorspace is 352,180sqm. This very slightly exceeds the identified need for the plan period (345,004sqm).

This is a firm source of supply – benefiting from having been granted planning permission. However, as with any proposal, there is a risk that this may not be implemented and can indeed be modified. But, having benefitted from having been granted planning permission (often at considerable expense), the City Council would expect most of this supply to be implemented.

Table 8.1 also recognises a further “potential supply” of 185,000sqm (as per Table 7.2 on page 63 (PDF page 64) of the ELNA ([ECON.001](#))).

On this basis, Oxford can meet its identified R&D need in full, relying only on the permitted commitments, that is if all of the commitments are implemented. The City Council has a good degree of confidence, based on engagement with developers, however a reliance solely on planning commitments with only a small potential over provision, would obviously carry risk. The potential supply (adding in the sites which are being promoted and which the City Council considers the principle of R&D can be supported) therefore provides the Plan with additional contingency. This contingency is to ensure that the Plan does not constrain economic growth, particularly in this nationally critical sector. It also recognises that any assessment of economic need is only ever a minimum.

A number of sites have been granted planning permission since the ELNA ([ECON.001](#)) was drafted, and the supply Tables it contains were compiled. The City Council has been monitoring R&D completions for the 2025/26 monitoring year. Table 3 below provides an update to the supply position and the overall need/supply balance for R&D as at 21 September 2026.

Table 3 shows that the total confirmed supply of R&D floorspace has increased from 352,180sqm to 358,274sqm. The confirmed supply is now about 14,000sqm in excess of the identified need for R&D. This is as a result of several planning permissions being granted. It also shows that the potential supply has reduced to 171,000sqm. This is due to several potential supply schemes being granted planning permission and because a revised planning application for the Ozone Leisure Park (re-submitted in June 2026), included reduced R&D floorspace. However, in total the updated data illustrates that there remains a comfortable pipeline to ensure that identified floorspace needs for R&D uses can be met in the plan period.

Table 3 - Need/supply balance for R&D uses (updated Sept 2026)

	R&D (sqm)
Identified need	345,004
Sources of supply:	
- Completions (2025/26 monitoring year)	33,519
- Under construction (anticipated delivery 2026/27 - 2027/28)	64,442
- Planning commitments	258,901
- Sub-Total: confirmed supply	358,274
Balance to find (rounded)	-13,000
Potential supply (rounded)	171,000
BALANCE	184,000

In relation to the overall need/supply balance, the key message to take away from this update is that good progress is being made on bringing sites forward and there is well-founded confidence in the work to calculate the pipeline.

The plan's policy approach generally supports those promoting 'potential' R&D space (within the locations allowed for by the employment strategy), given the strong national policy context, coupled with the need to be aspirational and positive towards this sector. As such, the City Council continues to work with promoters and landowners to progress these sites. As such, the City Council is confident that it has adequate provision, to meet, or exceed the minimum identified employment need R&D.

Q3 Will the Plan ensure that employment needs are met over the plan period? Is the economic strategy and the location of proposed sites sufficiently clear enough to be effective?

The economic strategy and scale of need

The economic strategy of the Plan ([CSD.001](#)) focuses on a network of Key Employment Sites, across which, the delivery of new employment generating uses otherwise referred to as traditional employment uses (i.e., Use Classes E(g)/B2/B8) are supported. The strategy also supports new employment generating uses in the city and district centres, as the most accessible locations in the city.

The Plan's economic strategy also recognises that existing employment sites and sites in lawful Use Class E (including those not designated as Key Employment Sites), can be legally redeveloped for employment purposes under Permitted Development Rights. Policy E1 therefore allows the intensification and modernisation of these sites for employment generating uses, providing criteria are met. See response to Matter 3, Issue 4, for more details.

The City Council considers that this economic strategy provides sufficient opportunities to accommodate the identified needs for all sectors of employment addressed in the ELNA, together with flexibility to ensure that economic growth is not stifled and that the plan can continue to be effective over time as circumstances may evolve.

How the Plan ensures R&D floorspace needs are met is discussed in the response to Matter 2, Issue 4, Question 2, while storage and distribution needs are covered in detail in response to Matter 2, Issue 4, Question 4. The zero floorspace need for industrial uses is also being met through the application of the plan's economic strategy. ELNA ([ECON.001](#)) supply Table 7.1 shows a modest, confirmed supply of industrial floorspace that is sufficient to meet the identified zero floorspace need. Matter 2, Issue 4, Question 1 provides further information as to how this need was calculated.

Given the recent strength of the Oxford's R&D market, developers have chosen to promote this higher value use in preference to more traditional office accommodation. However, the ELNA ([ECON.001](#)) recognises that a demand for offices is emerging as the market grows into AI. The ELNA also highlights that there is a strong demand for offices particularly in the city centre and analysis of recent planning permissions (2025/26 monitoring year) shows new office space has been recently permitted in this location.

The Plan provides a policy framework to enable the delivery of new office accommodation at suitable sites in the city and district centres and across the Key Employment Site network and sites in lawful employment use, should it be sought by the market. Given the modest, identified need (21,730sqm), the ELNA ([ECON.001](#)) does not recommend the identification of new land or sites. This is because, any growth in office accommodation can be absorbed into an existing portfolio of suitable sites at a range of locations across the city – i.e., the city and district centres, Key Employment Sites and sites in lawful employment use.

The Plan therefore creates the conditions to support the delivery of new office accommodation in line with market requirements which, given the strong demand in the city centre, and emerging demand as markets grow into AI. If market demands change over the plan period, plan's locational strategy (see below), remains and provides the flexibility to respond quickly to changes in economic circumstances and accommodate any needs not anticipated currently.

Table 4 provides an update to supply Table 8.1 in the ELNA. ([ECON.001](#)) This shows the identified need for each type of employment use floorspace and an up-to-date position on the supply. More detail is provided in Tables A1- A4 at Appendix 1 show the of R&D delivery in Oxford, is all coming forward in alignment with the plan's employment strategy, and Table A5 which also shows that this is similarly the case for the other employment land uses, all of which are being delivered across the Plan's Key Employment Site network, within the city and district centres or are coming forward on existing employment sites not designated as Key Employment Sites or through the redevelopment of sites in lawful Use Class E.

Table 4 showing sources of supply and the need/supply balance (Sept 2026)

	Office (sqm)	R&D (sqm)	Industrial (sqm)	Warehouse (sqm)
Identified need	21,730	345,004	0	46,086
Sources of supply:				
- Completions (2025/26)	392	33,519		
- Under construction (anticipated delivery 2026/27 - 2027/28)		64,442		
- Planning commitments	2,837	258,901	2,997	123
- Sub-Total: confirmed supply	3,229	358,274	2,997	123
Balance to find (rounded)	18,500	-13,000	0	46,000
Potential supply (rounded)		171,000		
BALANCE		184,000		

It is worth noting that the ELNA ([ECON.001](#)) considers that the modest office and warehousing needs can all be met through the existing employment land portfolio in the city (see answer to Q4 below for a more in-depth discussion about warehousing needs). As such, the ELNA ([ECON.001](#)) paragraph 8.21 on page 67 (PDF page 68) does not recommend a need to identify new land for any of the employment land uses.

The location of sites and the spatial strategy

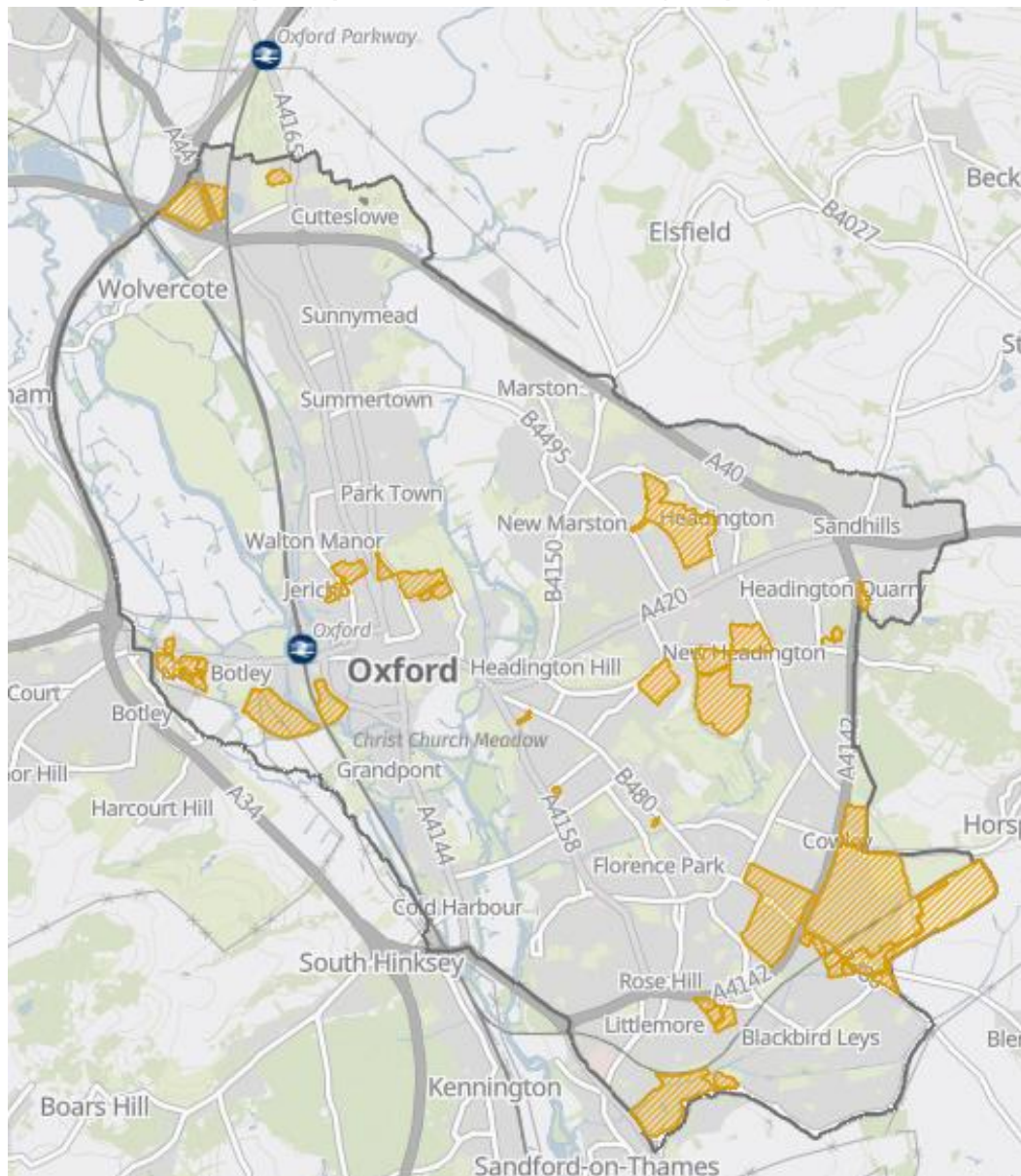
To ensure that employment needs are met over the plan period, the Oxford Local Plan 2045 ([CSD.001](#)) proposes the designation of 34 Key Employment Sites. (See Key Employment Sites Methodology Background Paper ([BGP.005](#)) for further details on how these sites were designated). These sites are listed in Appendix 3.1 of the Plan ([CSD.001](#)) and shown on the Policies Map ([CSD.007](#)). These sites are all larger, well-performing employment sites, for which the Plan ([CSD.001](#)) introduces criteria that must be met when a loss of floorspace relating to employment generating uses is proposed.

As set out above, in response to Matter 2 Issue 4 Question 2, the delivery of all new R&D floorspace (both in terms of the confirmed, and potential supply) is being put forward in line with the Plan's ([CSD.001](#)) locational strategy for employment generating uses (i.e., at Key Employment Sites; at sites within the city and district centres; or at sites in existing lawful employment use). This strategy builds on the employment strategy within the extant Local Plan 2036 ([DLP.001](#)).

Figure 1 spatially presents Oxford's designated Key Employment Sites as listed in Appendix 3.1 of the Plan ([CSD.001](#)) and shown on the Policies Map ([CSD.007](#)). The Key Employment Sites are generally found in sectoral clusters in locations that are currently very accessible, or that are in areas where significant/strategic accessibility improvements are planned. Where these clusters would also benefit from local scale infrastructure investments, including the delivery

of accessibility and public realm enhancements, these are identified in the Area of Focus policies.

Figure 1 - Spatial presentation of Oxford Key Employment Sites

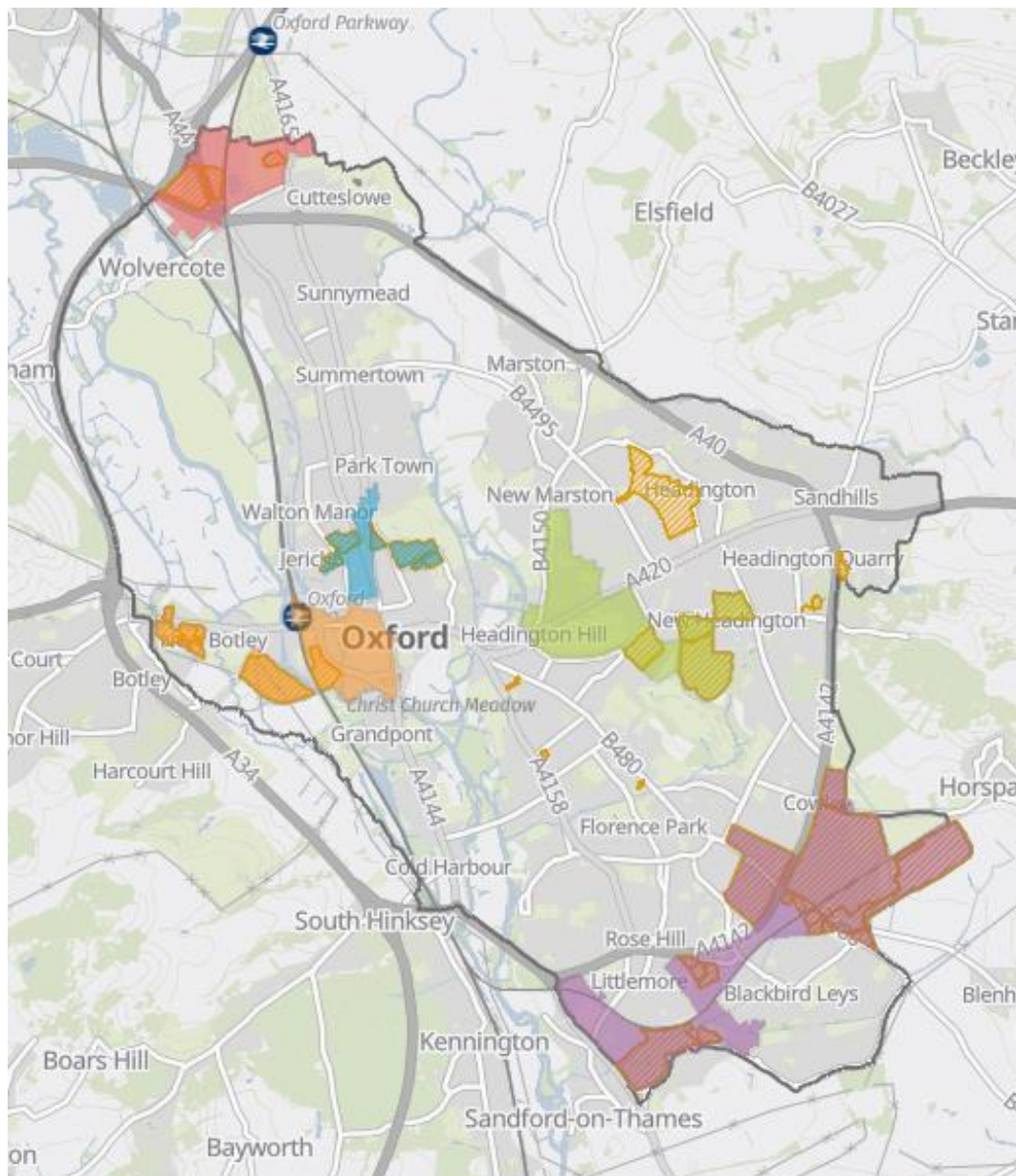


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Many of the Area of Focus policies align with some of Oxford's sector-related clusters of Key Employment Sites and perform varied economic functions (e.g., the Marston Road and Old Road Area of Focus, includes several Key Employment sites, which support jobs in the key sectors of health, teaching and research).

Figure 2 shows the locations of the Areas of Focus in relation to the Key Employment Sites. The proximity of certain related Key Employment Sites to one another has influenced the geographies of the Areas of Focus, as has their relationship to future planned strategic/significant infrastructure enhancements, such as the two new stations that are to be delivered to facilitate the re-opening of the Cowley Branch Line to passenger services.

Figure 2 - Oxford's Key Employment Sites and their relationship with the Areas of Focus

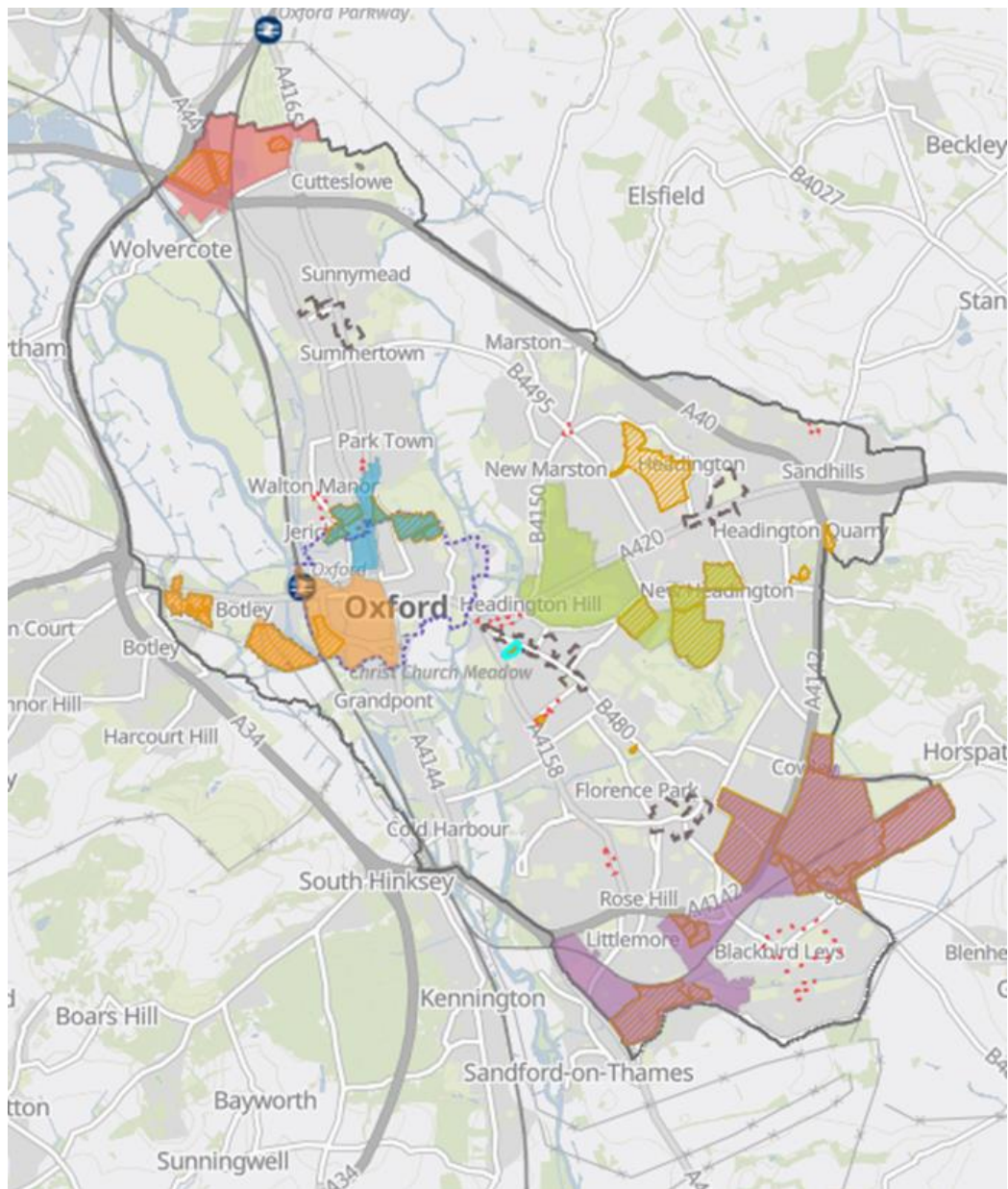


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It is worth noting that six Key Employment Sites are not located within an Area of Focus. With the exception of the John Radcliffe Hospital site (which also benefits from a site allocation policy), these are smaller Key Employments Sites that performed well against the assessment criteria, and which are generally well-located and/or perform an important local function.

The Plan's locational strategy also supports employment generating uses in the city and district centres. Figure 3 shows the location of the city centre (purple dotted line) and district centres (dark brown dashed lines) in conjunction with the Key Employment Sites and Areas of Focus. For instance, when considering the plan's locational strategy in relation to the delivery of "office" uses, more that 75% of new office space is being delivered in the city and district centres, see Table A5 at Appendix 1 of this Matter Statement for further details.

Figure 3 Location of the city and district centres in relation to the Key Employment Sites and Areas of Focus



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The spatial presentation of the city's Key Employment Sites and their corresponding Areas of Focus, as illustrated in Figure 3, shows five key clusters of Key Employment Sites.

Key Employment sites in the central (shaded light blue) and western clusters (shaded orange) are served by Oxford Railway Station and by good public transport and active travel connections both within the city and to further afield. While Key Employment Sites in the north of the city are served by Oxford Parkway Station and have good access to the Strategic Road Network.

Finally, the fifteen Key Employment Sites that form the Cowley Branch Line Area of Focus are likely to benefit from the re-introduction of passenger services to the Cowley Branch Line (which currently only operates freight). The development of two new railway stations and

associated public realm and active travel improvements to the area would be provide benefits both local residents and businesses.

Finally, it is important to consider the context, within which the plan's employment strategy has been developed. Paragraph 5.32 of the Employment BGP ([BGP.005](#)) sets out that the employment strategy sits within the plan's overall strategy, the focus on which is housing delivery (for which there is an unmet need identified).

In summary, the Oxford Local Plan 2045 ([CSD.001](#)) creates a clear, effective locational employment strategy which is designed to both support the plan's overarching strategy to focus on housing delivery and that enables identified employment needs to be met without new land needing to be identified for any of the employment land uses.

Q4 How will the needs for storage and distribution uses be met over the plan period?

As set out above in the response to Matter 2, Issue 6, Question 1, the ELNA ([ECON.001](#)) identified a total warehousing need of 46,086sqm. This included a low level of storage and distribution demand based on a "labour demand" scenario. The identified need therefore represents a modest increase (circa 13%) in the total existing stock of "Industrial and Distribution" floorspace in Oxford (circa 330,000sqm in 2025). This identified need takes into account market signals and reflects the fact that, as the population of Oxford continues to grow, further demand for local scale warehousing, serving people and businesses (including small-, and micro-scale first mile and last mile logistics, as well as local scale non-strategic storage and distribution uses), would be also expected to increase.

While the ELNA ([ECON.001](#)) acknowledges that demand for growth in storage and distribution uses is limited, the calculation of need also takes into account the intensive use of the existing stock. Table 5.5 of the ELNA ([ECON.001](#)) highlights that there is very little vacant space. As such, even in a low/ no growth scenario, additional space was needed for 'market churn and friction' reasons.

The ELNA ([ECON.001](#)) highlights there are no 'strategic' warehouse or storage facilities in Oxford. This is because the city lacks the accessibility needed to attract strategic warehousing. Paragraph 5.77 of the ELNA ([ECON.001](#)) highlights that take-up is almost exclusively local as evidenced and reported at Paragraph 5.80 ([ECON.001](#)). As such, demand for storage and distribution uses in Oxford is from companies servicing the city who require smaller, local-scale premises.

With regards to how identified storage and distribution needs could be met, it is important to recognise that, at the time the ELNA was being drafted, the R&D market was 'booming'. As such, when sites came forward for redevelopment (or development), they were principally being promoted for R&D. While producing the ELNA ([ECON.001](#)), no site promoter(s) had actively suggested that they would assist with the delivery of storage and distribution uses. however the City Council was an aware of sites that had the potential to deliver employment

floorspace, but where site owners/developers were yet to quantify the scale of opportunity. These sites are discussed briefly in paragraphs 7.10-7.11 of the ELNA ([ECON.001](#)).

However, this does not mean that there is no supply. A number of sites within the Key Employment Sites network are capable of supporting the delivery of storage and distribution uses over the plan period. Policy E2 includes a set of criteria, which are discussed in more detail in the response to Matter 3 Issue 4 Question 7. One of these criteria enables the delivery of B8 uses that are brought forward as part of a wider agreed masterplan at sites specifically allocated for that use.

For instance, the Unipart site is a circa 30ha Key Employment Site which benefits from a site allocation policy that specifically references B8 uses as part of a wider mix of employment-generating uses. Discussions between the City Council and the site owners, Logicor, have taken place throughout the plan-making process. These took place informally via email and virtual meetings and included engagement that was undertaken in line with the process set out in the Developing Local Plan 2045 Site Allocations Background Paper ([BGP.002](#)).

Logicor's Regulation 19 representation ([REP.3-117](#)) supports Policy SPS17 and the inclusion of Industrial (B2), storage and distribution uses (Class B8), and research and industrial processes (Class E) at the Unipart site. It also confirms that Logicor is exploring measures to improve the use of the site and supports the policy principles and site-specific requirements. It is anticipated that the Unipart site will be redeveloped on a phased basis within the plan-period for a range of employment uses. Policy SPS17 therefore enables the redevelopment of the site for a broad mix of employment generating uses which are expected to include B8 uses, allowing the Unipart site to respond appropriately to changes in occupier demand over the plan period.

Having a number of Key Employment Sites, including the Unipart Site, all of which could support (through Policy E2), the delivery of appropriately scaled B8 uses, to satisfy any occupier demand arising during the plan-period, means that the Plan provides the platform from which the storage and distribution and warehousing uses could be delivered in line with any market requirements arising.

The ELNA ([ECON.001](#)) recognises that maintaining and refurbishing space as well as enabling development of industrial/warehousing premises in the city is viable. However, given the recent strength of Oxford's R&D market, non-strategic warehousing (and industrial) uses have been seen as a less profitable, and therefore less attractive, alternative to the delivery of higher value R&D space. In a small, constrained city such as Oxford, redevelopment opportunities for non-strategic storage, distribution and warehousing uses, which support a lower jobs density, are more land intensive than other employment generating uses, have not been as widely promoted to the council as other higher value uses.

Rapleys – the consultants employed by the City Council to produce ELNA – note that due to the specialised nature of R&D property (including, in some cases, and a reluctance to mix uses for security reasons), sites that have come forward in the city, have been promoted for narrower more specialist use. Elsewhere in Rapleys experience, sites are promoted in a more 'open' or mixed' manner, and in these cases, an Employment Land Review/Needs Assessment can demonstrate more flexibility in the land supply. With regards to the "known" supply of floorspace as set out in Tables 7.1-7.2 of the ELNA ([ECON.001](#)), developers have chosen to

promote R&D. However, the City Council would also support other economic uses should market demand require them, as articulated through Policies E1 and E2 of the Plan.

The policy framework is therefore in place to enable the delivery of these uses on suitable sites within the Key Employment Site network should the market seek it. Given the modest need identified (46,086sqm), the ELNA ([ECON.001](#)) does not recommend the identification of new land or sites. This is because the growth in storage and distribution uses can be absorbed within the existing employment land portfolio – i.e., the Key Employment Sites. The Plan then supports B8 uses at these sites through Policy E2. If, market, and/or occupier demands change over the course of the plan-period, the Key Employment Site network will remain, and be able to accommodate any needs not anticipated by the plan.

The Plan therefore creates the conditions to support the delivery of B8 uses in line with market requirements should they arise during the plan period, while remaining flexible enough to respond quickly to changes in economic circumstances and accommodate any needs not currently anticipated.

Appendix 1 – Updated Floorspace Supply Tables for employment-generating uses

Tables A1-4 provide a factual update to ELNA ([ECON.001](#)) Tables 7.1 (extant permissions) and 7.2 (potential supply) for R&D floorspace. The information presented in these tables is meant to be helpful and provide the reader with more understanding about R&D floorspace supply and delivery. The tables also provide more of a spatial dimension to the information presented in ELNA ([ECON.001](#)) Tables 7.1 and 7.2.

The following tables update Tables 7.1 and 7.2 of the ELNA ([ECON.001](#)) in relation to R&D only:

- Table A1 - R&D Completions in the 2025/26 monitoring year
- Table A2 - R&D Under construction (anticipated completion 2026/27-2027/28 monitoring years)
- Table A3 - Remaining R&D extant permissions
- Table A4 - R&D “Potential” sources of supply

Table A5 updates Table 7.1 of the ELNA ([ECON.001](#)) in relation to the remaining employment generating uses (i.e., Office, Industrial and Warehousing).

Each table is presented on a new page to aid legibility.

Table A1: R&D Completions in the 2025-2026 monitoring year (Sept 2026)

1. Table A1 shows the completed R&D schemes in the 2025/26 monitoring year. This Table shows that a total of 33,519sqm permitted floorspace was delivered.

Table A1 R&D Completions in the 2025-26 monitoring year (Sept 2026)

PA Ref	Site Name	R&D sqm	Area of Focus	Key Employment Site
22/03067/FUL	Trinity House	17,669	Cowley Branch Line	ARC Oxford
18/02065/OUTFUL 1a)	Oxford North (Phase 1a)	15,850	Northern Edge of Oxford	Oxford North
TOTAL		33,519		

Table A2 - R&D Under construction (estimated completion 2026/27-2027/28) (Sept 2026)

2. Table A2 shows the sites listed in Table 7.1 of the ELNA ([ECON.001](#)) that are currently under construction, all of which are anticipated to be complete by 2028.

Table A2 R&D Under construction (anticipated completion 2026-28) (Sept 2026)

PA Ref	Site Name	R&D sqm	Area of Focus	Key Employment Site
24/009782/VAR	Littlemore House & Plot 18	26,668	Cowley Branch Line	Oxford Science Park
22/03076/FUL	135-137 Botley Road (Fabrica Lab)	16,992	West End and Botley Road	Botley Road Retail Park
19/02003/FUL	Plot 16, Oxford Science Park	10,815	Cowley Branch Line	Oxford Science Park
24/00335/FUL	Plot 4200, ARC Oxford	5,055	Cowley Branch Line	ARC Oxford
20/02672/FUL	SAE Institute, Littlemore House	3,500	Adjacent to Cowley Branch Line	Adjacent to Oxford Science Park
24/01434/FUL	Stansfield Park, Headington	1,412		Stansfield Park
Total		64,442		

3. It is worth noting that the planning application for the SAE Institute, Littlemore House, is linked to the Littlemore House & Plot 18 planning application at Oxford Science Park in the Cowley Branch Line Area of Focus.

Table A3 Remaining R&D Extant Planning Permissions (Sept 2026)

4. Table A3 shows the remaining sites with planning permission for R&D including sites that were previously listed within Table 7.2 of the ELNA ([ECON.001](#)), but that now benefit from having been granted planning permission. These sites are shown in red at the end of this table. The remaining R&D commitments currently total 260,313sqm

Table A3: Remaining extant permissions from Table 7.1 of the ELNA (Sept 2026)

PA Ref	Site Name	R&D sqm	Area of Focus	Key Employment Site	City or District centre
22/02954/OUT	Oxpens	60,854	West End and Botley Road	Oxpens	City centre
24/00662/VAR	Oxford North Reserved Matters	48,414	Northern Edge of Oxford	Oxford North	
22/2126/FUL	Plots 23-26 Oxford Science Park	41,958	Cowley Branch Line	Oxford Science Park	
22/02880/RES	Plot 2000, ARC Oxford	23,373	Cowley Branch Line	ARC Oxford	
24/02371/FUL	195 Botley Road and Unis 1 and 1a Botley Road Retail Park	21,220	West End and Botley Road	Botley Road Retail Park	
24/01631/FUL	Eastpoint Business Park	13,617	Cowley Branch Line	Eastpoint Business Park	
21/00110/FUL	Clarendon Shopping Centre	9,649	West End and Botley Road		City centre
22/02555/FUL	Plot 27, Oxford Science Park	9,306	Cowley Branch Line	Oxford Science Park	
24/00690/FUL	Beaver House and 39- 42a Hythe Bridge Street	8,712	West End and Botley Road		City centre
24/02372/FUL	Units 2-5 Botley Road Retail Park	8,710	West End and Botley Road	Botley Road Retail Park	
24/01302/FUL	Plot 5000, ARC Oxford	8,005	Cowley Branch Line	ARC Oxford	
22/02399/FUL	Latent Logic, Hollybush Row	401	West End and Botley Road		City centre
25/00799/FUL	152 London Road, Headington	3,484			District centre
25/01053/FUL	Plot 2700, ARC Oxford	2,610	Cowley Branch Line	ARC Oxford	
Total		260,313			

Table A4 Potential sources of supply (updated September 2026)

Table A4 updates Table 7.2 of the ELNA ([ECON.001](#)). This updates the “potential” sources of supply within employment designations.

Table A4 showing "potential supply" of R&D floorspace (Sept 2026)

PA Ref	Site Name	R&D sqm	Area of Focus	Key Employment Site	City or District centre
25/01588/FUL	Ozone Leisure Park	52,000	Cowley Branch Line	Existing site in Use Class E	
25/02577/OUT	Plots 8200, 8400 and 9200, ARC Oxford	56,050	Cowley Branch Line	ARC Oxford	
Known owner/ developer interest	Nuffield Sites	28,500	West End and Botley Road		City Centre
18/02065/OUTFUL	Oxford North (remaining floorspace granted under outline planning permission)	23,036	Northern Edge of Oxford	Oxford North	
24/02361/FUL	New Barclay House, 234 Botley Road	11,360	West End and Botley Road	Botley Road Retail Park	
Total		170,946			

Each site in Table A4 is considered below and an update is provided where the situation has changed since October 2025:

- Ozone Leisure Park – Planning application re-submitted (June 2026) under the same planning application reference. Re-submission reduces R&D floorspace to circa 52,000sqm (GIA) from previously assumed 60,000sqm (GIA). This has been reflected in the relevant supply tables.
- Plots 8200, 8400 and 9200, ARC Oxford – no change. Permission seeks R&D floorspace
- Nuffield Sites – landowner considering class E employment uses. R&D has been assumed.
- Oxford North – although this floorspace technically has planning permission for Class B1 employment floorspace as part of the Oxford North outline planning consent. Several Reserve Matters Applications have been granted at Oxford North but not yet commenced. As such, this remaining floorspace (which is assumed to be R&D) has been considered additionally as a potential source of supply.
- New Barclay House, 234 Botley Road – ongoing technical work is being undertaken to progress the planning application. R&D proposed.

Table A5 Update to ELNA Table 7.1 for Office, Industrial and Warehousing uses (Sept 2026)

Table A5 updates Table 7.1 of the ELNA ([ECON.001](#)), showing new sites that have been granted planning permission and also provides an update to the status of each scheme.

Table A5 Update to Office, Industrial and Warehousing uses (Sept 2026)

PA Ref	Site Name	Status	Office sqm	Industrial sqm	Warehousing sqm	Key Employment Site	City/District centre
22/01532/CT3	Standingford Hse, 26 Cave Street*	Permission lapsed				existing site (Use Class E)	
23/01950/FUL	County Trading Estate (Minoli), Transport Way,	permission granted	623			County Trading Estate	
22/01311/FUL	52 and 55 High St, Oxford	Complete (2025/26)	147				city centre
24/02043/FUL	4 and 5 King Edward Street	Complete (2025/26)	146				city centre
23/01424/FUL	385 Cowley Road	Complete (2025/26)	99			existing site (Use Class E)	
23/01482/FUL	13-15 Oxenford House, Magdalen St	permission granted	6				city centre
21/01695/FUL	Thornhill Park**	permission granted		2,578		existing site (Use Class E)	
22/01274/FUL	Old Station Yard, Unit 2, Watlington Road	commenced		282		existing site (Use Class E)	
23/02473/FUL	332 Abingdon Road	Complete (2025/26)		80		existing site (Use Class E)	
23/00292/FUL	45 Catherine Street	Complete (2025/26)		57		existing site (Use Class E)	
25/00193/FUL	Cantay House, Park End Street	permission granted (2025/26)	2,208				city centre
TOTAL			3,229	2,997	123		

* Planning permission was granted for 856sqm of office floorspace at this site. However, the permission has now lapsed, and the scheme was not implemented. This has been reflected in the totals.

Additional schemes involving employment generating uses where planning permission has been granted are highlighted in red above.

